

**Forest Management and Chain of Custody
Certification Evaluation Report for the:**

**Wisconsin County Forest Program
Managed by Wisconsin DNR
Conducted under auspices of the SCS Forest Conservation Program
SCS is an FSC Accredited Certification Body**

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-0083G**

Submitted to:

WI DNR

Date of Field Audit: Sept. 27-Oct. 5, 2004 Date of Report: November 2004; Report finalized: March 2005	Authored by: Dave Wager, Dan Pubanz, Gary Zimmer, Mike Ferrucci
-----------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------

By:

**SCIENTIFIC CERTIFICATION SYSTEMS
2000 Powell St. Suite Number 1350
Emeryville, CA 94608, USA**

SCS Contact: Dave Wager

Organization of the Report

Section A of this report provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section B contains more detailed results and information for the use of the client and for FSC accreditation monitoring.

SECTION A. PUBLIC SUMMARY & BACKGROUND INFORMATION.....	4
1.0 GENERAL INFORMATION	4
1.2 General Background	4
1.3 Forest Management Enterprise	6
1.3.1 Background Information	6
1.3.2 Management Objectives.....	8
1.3.3 Silvicultural Systems	8
1.3.4 Estimates of Maximum Sustainable Yield.....	9
1.3.5 Past and Current Timber Production of County Forest Program.....	9
1.4 Environmental and Socioeconomic Context.....	11
1.4.1 Environmental Context	11
1.4.2 Socioeconomic Context	12
1.4.3 High Conservation Value Forests	12
1.5 Administrative Context.....	13
1.6 Products Produced	13
1.7 Chain-of-Custody - Tracking, Tracing and Identification of Products.....	14
1.8 Other Activities.....	15
2.0 THE CERTIFICATION ASSESSMENT PROCESS.....	15
2.1 Assessment Dates.....	15
2.2 Assessment Team.....	15
2.3 Assessment Process	16
2.3.1 Main Items and Places Inspected.....	17
2.3.2 Justification for selection of items and places inspected	23
2.4 Stakeholder Consultation	24
2.4.1 Summary of Legal and Customary Use-rights.....	24
2.4.2 Identification of Stakeholders	25
2.4.3 Summary of Stakeholder Concerns and Perspectives	26
2.5 Guidelines/Standards Employed.....	29
2.6 Scoring Process.....	29
3.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS	31
3.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C.....	32
3.2 Certification Recommendation and Justification.....	39
3.3 Peer Reviewers.....	39
3.4 Proposed CARs attached to certification	39
4.0 AUDITS	46
5.0 PUBLIC INFORMATION ABOUT the FOREST MANAGEMENT PLAN	46
Section B. Detailed Results of the Full Evaluation.....	46
SECTION 1.0 DETAILED OBSERVATIONS & RESULTS	46
CRITERION#1: Group Entity Organizational Competency	46
CRITERION#2: Reporting and Documentation.....	46
CRITERION#3: Group Member Oversight System—Internal Control System	46
CRITERION#4: Group Stability and Continuity	46
PRINCIPLE #1: COMPLIANCE WITH LAWS & FSC PRINCIPLES	50

PRINCIPLE #2: TENURE AND USE RIGHTS/RESPONSIBILITIES.....	54
PRINCIPLE #3: INDIGENOUS PEOPLES’ RIGHTS	56
PRINCIPLE #4: COMMUNITY RELATIONS & WORKERS’ RIGHTS	60
PRINCIPLE #5: BENEFITS FROM THE FOREST.....	65
PRINCIPLE #6: ENVIRONMENTAL IMPACT	71
PRINCIPLE #7: MANAGEMENT PLAN.....	84
PRINCIPLE #8: MONITORING AND ASSESSMENT	88
PRINCIPLE #9: MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS ..	92
PRINCIPLE #10: PLANTATIONS.....	96
2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS	97
2.1 Evaluation of Risks of Mixing Certified and Un-Certified Product	97
2.2 Description of the Log Control System	98
2.3 End Point of Chain of Custody	98
2.4 Visual Identification at End Point of Chain of Custody	98
3.0 CONTROVERSIAL ISSUES.....	98
4.0 CERTIFICATION RECOMMENDATION.....	99
4.1 Explanation of Scoring and Weighting Methods.....	99
4.2 Recommendation	99
5.0 Appendices.....	99
5.1 Agreement on the implementation of certification conditions	99
5.2 Peer Reviewer Comments.....	100
5.3 Conversion English Units to Metric Units Table.....	109
5.4 Public Notification Letter	111

SECTION A. PUBLIC SUMMARY & BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

FSC DATA REQUEST

- Applicant entity: Wisconsin DNR, County Forest Program
- Contact person: Jeff Barkley
- Address: 101 S. Webster St., P.O. Box 7921, Madison, WI 53707-7921
- Telephone: (608) 264-9217
- Fax: (608) 846-5045
- E-mail: jeffrey.barkley@dnr.state.wi.us
- Products: Hardwood and softwood stumpage
- Number of Acres/hectares seeking to be certified: 1,085,281 acres
- Nearest Town: Madison, Wisconsin
- Tenure: Public, county owned
- Forest Composition: A mosaic of conifer and hardwood cover types, classified by species dominance; e.g., white pine, spruce-fir, northern hardwoods, central hardwood, oak, red maple, aspen, pine plantations
- Managed as: Natural Forest

1.2 GENERAL BACKGROUND

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Wisconsin Department of Natural Resources to conduct a certification evaluation of the portion of the Wisconsin County Forest Program (WCFP) seeking FSC certification. The Wisconsin County Forest Program, in cooperation with Wisconsin Department of Natural Resources (DNR), is seeking Forest Stewardship Council (FSC) certification for a portion of its County Forests. Of the 27 Counties, 16* are seeking FSC (see Table 1). Consistent with FSC group certification protocols, the Wisconsin Department of Natural Resources (DNR), in its support role to the individual county forest management operations, is serving as the group entity or group manager. Should certification be awarded, WI DNR would be the FSC certificate holder for the Wisconsin County Forest group scheme. The 16* Counties seeking FSC certification are referred to as the group members.

***Note: Originally 18 Counties elected to seek FSC certification, however 2 Counties decided to only pursue SFI certification after the full evaluation had been conducted**

The term “County Forests” used throughout this report refers to only those Counties seeking enrollment in the FSC Group Scheme managed by DNR.

Table 1.

	acres	Certificate sub-code
Ashland	40,003	SCS-FM/COC-0083G-a
Barron	15,827	SCS-FM/COC-0083G-b
Bayfield	168,809	not currently enrolled in FSC group
Chippewa	33,107	SCS-FM/COC-0083G-c
Clark	132,852	SCS-FM/COC-0083G-d
Douglas	269,642	not currently enrolled in FSC group
Eau Claire	52,278	SCS-FM/COC-0083G-e
Florence	36,390	SCS-FM/COC-0083G-f
Forest	10,848	SCS-FM/COC-0083G-g
Iron	174,321	SCS-FM/COC-0083G-h
Jackson	120,887	SCS-FM/COC-0083G-i
Juneau	15,146	SCS-FM/COC-0083G-j
Oconto	43,516	SCS-FM/COC-0083G-k
Price	92,119	SCS-FM/COC-0083G-l
Sawyer	113,851	SCS-FM/COC-0083G-m
Taylor	17,566	SCS-FM/COC-0083G-n
Washburn	149,015	SCS-FM/COC-0083G-o
Wood	37,554	SCS-FM/COC-0083G-p
Total Acres	1,085,281	

***Note 2 Counties- Bayfield and Douglas decided to only pursue SFI certification after the full evaluation had been conducted- thus the total number of group members is 16 and the acreage is 1,085,281.**

In Sept/Oct 2004, an interdisciplinary team of natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 9 day field and office audit as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team assigned performance scores to the relevant FSC Criteria and, from those scores, generated weighted average performance scores for each of the 9 FSC Principles, in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification

to Wisconsin County Forest Program. As detailed below, certain pre-conditions (also known as Major Corrective Action Requests) that were stipulated by the audit team upon completion of the field audit were addressed by DNR and cleared by SCS prior to finalization of this report. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

1.3 FOREST MANAGEMENT ENTERPRISE

1.3.1 Background Information

Land History/Forest Type

According to the *County Forest Comprehensive Land Use Plan 2005 Template*, “At one time, much of Wisconsin was covered with magnificent stands of pine, hemlock, and hardwoods on the highlands, and cedar, spruce, and balsam on its lowlands. From 1860 to about 1910, these forests provided raw material for a thriving lumber industry. The need to supply lumber for a growing nation, and the lack of sound forest management, resulted in overharvest of the forests and degradation of the landscape. Immigrants rushed to these newly cleared lands, hungry for a place to farm and build their lives. But in just a few years, the soils gave out, catastrophic fires occurred, and many people were forced to seek their fortunes elsewhere. The land was left exhausted and tax delinquent. The Wisconsin County Forest program originated with the taking of these tax delinquent lands.”

The Wisconsin’s County Forests should be viewed not as individual forests, but as a larger eco-region. *County Forest Comprehensive Land Use Plan 2005* reports “the National Hierarchical Framework of Ecological Units (NHFEU) categorizes Wisconsin into two provinces, the Laurentian Mixed Forest (212) forming the northern half of the State and the Eastern Broadleaf Forest (222). Within each province are sections, subsections and landtype associations that further group land into areas with similar geology, soil types, surface water features, wetlands and historic and potential plant communities.”

County Forest Program

The roles of the *group entity* (DNR) are clearly established in Wisconsin Statutes. According to the *Public Forest Lands Handbook* “Section 28.11, Wisconsin Statutes, requires that the Department provide technical assistance to counties having lands entered in the county forest program”. The most prominent role of DNR in the County Forest Program is headed up by the liaison forester, one per County. The liaison forester is responsible for coordinating the state/county partnership from the state standpoint by administering the county forest law (s. 28.11, Wis. Stats.). The *Public Forest Lands Handbook* reports “The liaison forester is expected to have a high level of technical expertise and function as the Department’s primary source for technical assistance and provide technology transfer to county forest personnel. The liaison must fully understand the Department’s overall capabilities and activities and maintain a good working knowledge of all facets of their county forest program.”

Responsibilities of the liaison forester include but are not limited to (as detailed in the *Public Forest Lands Handbook*):

- Attend all meetings of the county forest committee.
- Personally render or arrange for appropriate Department technical assistance to be provided for county forest administration.
- Coordinate county forest administration contacts from other Department personnel.
- Compile bi-annual county forest accomplishments of contributing foresters and report to the forestry team leader.
- Administer the County Forest Law
- Participate in establishing annual goals for timber sale establishment.
- Help formulate, investigate, and process applications for lands entered or withdrawn.
- Participate in development of project and variable acreage share loan requests.
- Review and approve all timber sale cutting notices/reports.
- Attend all county forestry committee meetings and any county board meetings as requested.
- Provide technical assistance
- Cruise and mark timber
- Timber sale inspections and Timber sale administration
- Continue development and maintenance of compartment reconnaissance on the county forest including data collection and analysis, records, updating, management information systems, i.e. GIS;
- Function as a catalyst for technology transfer.

The following DNR Divisions and Bureaus also provide assistance to the County Forest Program:

Endangered Resources - Bureau of Endangered Resources
 Fisheries Management - Local fisheries biologist
 Forest Management - Liaison forester - Field silviculturist
 Geographic Information Systems - GIS Coordinator, Division of Forestry
 Land Acquisition - Regional real estate agent
 Protection: Insects and disease - Regional entomologist/forest pathologist
 Fire Management - Local forester/ranger
 Recreation Management – Bureau of Parks and Recreation
 Grants - Community services specialist
 Water Regulations and Zoning - Water regulation specialist
 Water Resources, Best Management Practices - Forest Hydrologist, Division of Forestry
 Wildlife Management - Local wildlife biologist

The Counties along with DNR cooperate with the Wisconsin County Forests Association, Inc. (WCFA). This association was incorporated on May 15, 1968 under Chapter 181 of the Wisconsin Statutes, without stock and not for profit. The WCFA Board of Directors is composed of ten delegates elected from the County Forestry Committees who are members of the Association. The association provides a forum for consideration of issues and policy that are common to all of the county committees responsible for their respective County Forest programs, including those programs encompassed under s.28.11 and Chapter 77, Wis. Stats. WCFA also provides leadership and counsel to County Forest administrators and forestry committees through regular meetings and active committees on legislative and recreational issues.

1.3.2 Management Objectives

As detailed in the *County Forest Comprehensive Land Use Plans*, “Natural resources, such as those provided by the County Forest, are the base for addressing the ecological and socioeconomic needs of society. The mission of the County Forest is to manage, conserve and protect these resources on a sustainable basis for present and future generations.

County Forest resources should be protected from natural catastrophes such as fire, insect and disease outbreaks, and from human threats such as encroachment, over-utilization, environmental degradation and excessive development. While managed for environmental needs including watershed protection, protection of rare plant and animal communities, and maintenance of plant and animal diversity, these same resources must also be managed and provide for sociological needs, including provisions for recreational opportunities and the production of raw materials for wood-using industries. Management must balance local needs with broader state, national and global concerns through integration of sound forestry, wildlife, fisheries, endangered resources, water quality, soil, and recreational practices. Management will provide this variety of products and amenities for the future through the use of sustainable forest management practices.”

1.3.3 Silvicultural Systems

Silvicultural systems employed on County forests are guided by the DNR Silviculture and Forest Aesthetics Handbook (HB 2431.5). The Wisconsin County forests span a wide bio-geographic extent of the State of Wisconsin as well as all of the major forest types found in the State. As a result, the DNR and Counties employ a broad range of silvicultural systems in the management of the timber resources found on the County Forests. Silvicultural systems include a full array of even-aged and uneven-aged silvicultural systems. With general guidance found in the Handbook, silvicultural systems are defined by forest cover type. Regardless of the specific system employed on any given cover type within any of the County Forests, the following general objectives apply:

Encourage stands containing the greatest quality and quantity of timber

Encourage vigor within all developmental stages of forest stands

Through modification of silvicultural prescriptions and practices, accomplish desired aesthetic management objectives

Under both even-aged and uneven-aged systems, a fundamental goal is to promptly establish new stands or age-class cohorts with every regeneration entry, relying either upon natural or artificial regeneration, as dictated by site conditions, harvesting method and cover type requirements. Reliance on natural regeneration is most prevalent. Likewise, all intermediate treatments (i.e., harvest entries not categorized as regeneration harvests, such as pre-commercial and commercial thins) are aimed at promoting improved stand health and vigor.

Even-aged regeneration harvests (e.g., clearcutting) are further modified to address aesthetic and wildlife management considerations and objectives. These are commonly addressed through retention of patches or individual trees. Boundaries are designed to discourage long sitelines and to provide aesthetic variety.

For even-aged systems, the target rotation ages are generally approximate to or beyond culmination of mean annual increment and are often longer than rotation lengths employed on industrial timberlands in the region.

1.3.4 Estimates of Maximum Sustainable Yield

Allowable harvests are set at the individual County level, based on DNR's forest reconnaissance inventory system (Recon), which allows modification at the County level.

Harvests are "regulated" at the forest level using area control where the annual allowable harvest, measured in acres per year, is disaggregated to forest cover types. Very simply, the allowable harvest for a given forest cover type (e.g., aspen) is computed as the total available area occupied by a cover type within a County Forest divided by the planned "rotation age" for that cover type. For example, Ashland County uses a 44-year rotation (based on site index data) for 6619 acres of aspen. Thus, the annual allowable cut is 151 acres (6619/44). Additionally, the Recon system allows Counties to adjust rotation age using early and late restraints. This allows for modified rotations in order to provide for a sustained flow of revenue and supply to industry, improve age class distribution, and to provide an opportunity to factor local experience into harvest scheduling. For example if Ashland set the constraints at 5-yr early and 5-yr late the Recon program would identify/schedule stands for harvest that are between 39 and 49 years. Forest areas zoned for special uses such as Natural Areas and Aesthetic Zones (e.g., buffers around lakes) are removed (zzz'd out) of the allowable harvest land base.

The Recon system is fundamentally dependent upon accurate inventory data. Recon data is updated following periodic inventory activities (not to exceed 20 years). Rotation lengths employed in the allowable harvest calculation process represent a balance between economic and biological optimums and are generally longer than industrial norms for this region.

For over the past decade, actual harvests on the County Forests have been slightly below allowable levels, as measured in acres treated with partial (intermediate) and regeneration harvest prescriptions. The "under harvest" varies considerably by County but, in total, actual harvests are roughly 75% of growth.

1.3.5 Past and Current Timber Production of County Forest Program

Harvest History FY1985-2004

Fiscal Year	Cord Equivalents cut	Cut Acres	Cds./Cut Acre	Ave sale size	# sold sales	# of Acres sold	# of Cd. Equiv. Sold
1985	625,172	42,650	14.66	42	820	34,440	505,120

1986	603,821	40,896	14.76	42	824	34,608	516,648
1987	648,243	43,338	14.96	42	991	41,622	630,276
1988	636,320	42,022	15.14	42	838	35,196	538,834
1989	721,133	45,958	15.69	41	952	39,032	608,328
1990	729,687	44,065	16.56	43	964	41,452	694,080
1991	666,310	40,713	16.37	42	936	39,312	651,456
1992	654,082	40,587	16.12	43	973	41,839	673,316
1993	790,835	49,302	16.04	49	852	41,748	673,080
1994	717,355	43,379	16.54	45	867	39,015	644,181
1995	832,217	52,424	15.87	53	787	41,711	658,719
1996	727,439	47,170	15.42	47	623	29,281	454,167
1997	792,594	47,100	16.83	51	633	32,283	540,582
1998	648,106	40,813	15.88	53	742	39,326	619,570
1999	639,672	39,845	16.05	54	756	40,824	658,476
2000	607,036	41,089	14.77	51	754	38,454	571,532
2001	717,224	44,623	16.07	54	721	38,934	621,502
2002	683,682	43,045	15.88	52	767	39,884	640,445
2003	563,416	37,670	14.96	55	729	40,095	599,238
2004	726,029	45,926	15.81	58	701	40,658	643,518

1.4 ENVIRONMENTAL AND SOCIOECONOMIC CONTEXT

For the interested reader, there is an extensive collection of DNR developed documents that provide additional detail on the environmental and socioeconomic context in which the management of the County Forests operates. Many of these documents are available on the DNR web site or can be requested from the DNR. Some documents of note include:

- County Forest Comprehensive Land Use Plans
- Public Forest Lands Handbook (2460.5)
- Wisconsin Ecological Landscapes Handbook (HB 1805.1)
- Wisconsin Forests at the Millennium; An Assessment (2000)
- Wisconsin's Northern State Forest Assessments; Socioeconomics in Northwest Wisconsin (December, 1999)

1.4.1 Environmental Context

County Forests include a range of size classes (regeneration, sapling-pole, and saw timber) and structure (canopy, layers, ground vegetation, dead and downed material, and inclusions). Forest cover types include Aspen, Northern Hardwoods, Hemlock Hardwood, Oak; Swamp Hardwoods, Red Maple, White Pine, Jack Pine, Fir-Spruce, Swamp Conifer, Black spruce, Tamarack, White cedar, Scrub oak, Bottomland hardwoods, and White birch.

The majority of the County Forests are the result of natural regeneration or tree planting that occurred in the early to mid-1900's. Early succession aspen is still a dominant forest type on County Forests. However, mid- to late-successional maple-basswood forests and in some cases white pine forests are replacing early succession aspen-birch and oak forests that dominated the areas from 1940 to 1970. Savannas, barrens, and advanced successional stages are ecosystems that are extremely rare in the State. Management opportunities exist on the County forests to maintain or restore these components.

Due to fire suppression, forest disturbance patterns have changed dramatically over the past century on the County Forests. Logging, windthrow (and other weather related events (e.g. hail), and disease, are now the main forest disturbance forces. Invasive exotics, like much of the U.S., have or are becoming problematic on County forests. The gypsy moth, emerald ash borer, garlic mustard, buckthorn, spotted knapweed, and Japanese barberry are some of the exotics that pose a major threat to Wisconsin's forests.

The County Forests play an important role in maintaining large tracts of intact forested lands. Wisconsin forests are being fragmented due to road building, agriculture and urban development. County Forests located in northern Wisconsin, in conjunction with Federal, State, and private land ownerships, make up one of the largest forested tracts in the United States.

1.4.2 Socioeconomic Context

The most notable aspect of the socioeconomic context for the County Forests is their public land status. As such, they are managed for the public interests according to a body of statutory and regulatory requirements from the Department of Natural Resources and Counties. The County forests provide a very significant public resource for the citizens of Wisconsin and the upper mid-west (particularly Illinois and Minnesota). The significance of this public resource is measured in both market-based and non-market terms.

The Wisconsin County Forest Webpage www.wisconsincountyforests.com states “The importance of the County Forests to Wisconsin's economic health continues to increase. County Forests sustain over 30,000 full-time jobs derived from logging, trucking, paper production, manufactured building materials, and lumber. Many of these jobs are in such businesses as the expanding printing industry and are located far from the forested northland.

In addition, the lands managed by these 29 counties provide an important recreation resource to complement our state's valuable tourism industry. Wisconsin's County Forests provide a multitude of recreational opportunities. There are more than 2.4 million acres available to the general public to use for a variety of recreational pursuits. As population increases, the need for accessible lands unquestionably will assume an ever more important role.”

1.4.3 High Conservation Value Forests

As required by FSC Principle 9, the evaluation team emphasized the importance of maintaining selected sites as High Value Conservation Forest within the defined forest area, and audited accordingly. HCVF may include unique or threatened ecological areas and/or areas of cultural significance that must be managed so as to maintain the attributes that make them of high conservation value. That is, HCVF cannot be converted to other types of forest cover lacking in the attributes that make these areas HCVF. Within the Wisconsin County Forests, the most likely HCV areas include:

- Barrens
- Other Habitat for endangered species
- Areas containing tribal cultural and archeological resources
- Oak savannas
- Any State Natural Areas
- Wild rice marshes
- Mesic hemlock-hardwood forests
- Dry-mesic forests including natural pine stands
- Large peatlands
- Northern sedge meadows
- Large blocks of contiguous forests

1.5 ADMINISTRATIVE CONTEXT

Management of the County Forests is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in the County Forests are associated with the following statutes:

Pertinent Regulations at the Federal Level:

Endangered Species Act
Clean Water Act (Section 404 wetland protection)
Occupational Safety and Health Act
National Historic Preservation Act
Archaeological and Historic Preservation Act
Americans with Disabilities Act
U.S. ratified treaties, including CITES

Pertinent Regulations at State and Local Level:

The County Forest Law (s 28.11 Wis. Stats.)
Wisconsin Environmental Policy Act (WEPA) (Section 1.11, WI Statutes, NR 150, WI Administrative Code)
Wisconsin Pesticide Law (Chapter 94, WI Statutes)
Use of Pesticides on Land and Water Areas of the State of Wisconsin (WI Administrative Code, Chapter NR 80)
Wisconsin Spill Law (Chapter 144, WI Statutes)
Wisconsin Groundwater Law (Chapter 160, WI Statutes)
Management of Public Forests (Chapter 28, WI Statutes)
Navigable Waters (Chapter 30, WI Statutes)
Water Quality Standards for Wetlands (Chapter NR 103, WI Administrative Code)
Endangered and Threatened Species (Chapter NR 27, WI Administrative Code)

1.6 PRODUCTS PRODUCED

<u>Species</u>	<u>Primary Use</u>	<u>Secondary Use</u>
White Pine	Lumber	Christmas Trees, Pulpwood
Red Pine	Pulpwood, Lumber	Cabin Logs, Poles
Jack Pine	Pulpwood	Lumber
Tamarack	Posts, Poles	Pulpwood, Lumber
Black Spruce	Pulpwood	
White Spruce	Pulpwood	Lumber, Christmas Trees
Hemlock	Pulpwood	Lumber
Balsam Fir	Pulpwood, Wreaths	Lumber, Christmas Trees
Northern White Cedar	Posts, Poles	Lumber, Shingles
Red Cedar	Lumber, Closet Liners	Posts
White Ash	Handles, Furniture	Lumber

Aspen	Pulpwood, Particleboard	Furniture, Pallets, Plywood
Basswood	Lumber, Pulpwood	Furniture, Carving Block
Beech	Handles	Lumber, Pulpwood
White Birch	Toothpicks, Ice Cream Sticks	Pulpwood, Craft Items (Bark)
Yellow Birch	Furniture, Veneer	Pulpwood
Butternut	Furniture, Trim	
Black Cherry	Furniture, Trim	Handles
Cottonwood	Pallets, Boxes	Lumber, Pulpwood
Elm	Furniture	Pulpwood
Shagbark Hickory	Handles	Firewood, Meat Smoking
Red Maple	Pulpwood, Lumber	Furniture, Firewood
Sugar Maple	Pulpwood, Furniture, Floors	Veneer, Firewood, Syrup
Red Oak	Ties, Furniture, Veneer	Trim, Firewood
White Oak	Construction, Trim	Ties, Firewood
Black Walnut	Furniture, Trim	Gunstocks
Sphagnum Moss	Floral Designs	Worm bedding
Wild Rice	Food	
Berries	Food	
Wildlife	Hunting, Fishing, Viewing	Trapping
Mushrooms	Food	

1.7 CHAIN-OF-CUSTODY - TRACKING, TRACING AND IDENTIFICATION OF PRODUCTS

At the request of the certification applicant, SCS conducted a joint forest management and chain-of-custody certification evaluation of the defined forest area. Chain-of-custody certification is required throughout the supply chain if downstream purchasers and processors wish to carry forward the certified status of wood products sourced from the County Forests. With respect to the County Forests, the chain-of-custody focus is quite narrow, as Counties exclusively sell standing timber. That is, the DNR/Counties do not have control of the flow of wood products from the County Forests once the trees have been severed from the stump, by the successful bidder.

Chain-of-Custody obligations for the County Forest Program are:

- Upon request from SCS, making available the following County Forest timber sale information: purchaser's name and contact information, species and volume sold, date of sale
- Notifying SCS and/or the FSC of any instances when a purchaser of County Forest timber (not holding a valid FSC-endorsed chain-of-custody certificate) uses the FSC logo
- Maintaining timber sale records for at least 5 years

As is detailed in Section 10.1 of this joint FM/COC certification evaluation report, it is the conclusion of the SCS evaluation team that the County Forest Program is capable of meeting the relevant chain-of-custody requirements.

1.8 OTHER ACTIVITIES

Wisconsin households spend over \$5.5 billion per year on goods and services associated with forest-based recreation. Recreation is one of the primary uses of the County Forests. Hunting, ATV use, snowmobiling, hiking, bird watching, boating, fishing, camping, and cross country skiing, are examples of popular recreational activities that occur on the County Forests. In addition to commercial timber production and recreational use, the County Forests are utilized for other activities such as:

Academic and government research on forest ecology, wildlife, timber management, public use, etc.

Gathering of non-timber forest products such as boughs, sphagnum moss and florals

Sale of Christmas trees

2.0 THE CERTIFICATION ASSESSMENT PROCESS

2.1 ASSESSMENT DATES

Preliminary Assessment: November 3-7, 2003

The preliminary assessment conducted in November 2003 included reviews of Lincoln, Washburn, and Eau Claire Counties.

Certification Audit: September 27 - October 5, 2004

The full assessment included reviews of Wood, Douglas, Iron, Clark, Taylor, and Oconto Counties.

2.2 ASSESSMENT TEAM

Dave Wager, Team Leader:

Mr. Wager is Director of Forest Management Certification for SCS. During his 4 years as Director, Mr. Wager has overseen the day-to-day operations of the program and conducted Forest Management and Chain-of-Custody evaluations throughout the world. Recent evaluations conducted by Mr. Wager include preliminary assessment of Wisconsin County Forests, State of PA Bureau of Forestry, State of Massachusetts, Perak ITC- Malaysia, and Collins Lakeview Forest. In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 60 active clients. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth reduction in Utah's Central Wasatch Mountains.

Dan Pubanz: Dan M. Pubanz, Consulting Forester; BS (1985), MS (1988), UW-Madison. He has been an auditor or team member in over 15 CoC and FM audits/assessments under FSC principles. He has 19 years of experience in field, supervisory, and administrative forest management work. His area of expertise is in Lake States silviculture and forest management planning.

Mr. Michael Ferrucci: Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 16 years. Its clients include private citizens, land trusts, municipalities, corporations, private water companies, and non-profit organizations. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies. Mike Ferrucci served as a team member on the 2003 Full Evaluation of Wisconsin State Forests

Mr. Gary Zimmer: Gary Zimmer is a certified wildlife biologist with 21 years of professional experience in public and private forest management. A native of Northern Wisconsin, Gary is currently the Western Great Lakes Regional Biologist with the Ruffed Grouse Society. He holds a M.S. degree in natural resources from the University of Wisconsin – Stevens Point and also received a B. S. degree from the same academic institution, in wildlife management. He was employed for 18 years with the USDA Forest Service in a variety of positions ranging from forestry technician to district biologist. Since leaving federal service in 2000, Gary has worked closely with public and private land managers throughout a five-state region managing forest wildlife habitat. Gary served as the biologist on the 2003 Full Evaluation of the Wisconsin State Forest.

2.3 ASSESSMENT PROCESS

The objective of the assessment process is to collect the necessary information to judge the degree to which management of the County Forest Program conforms to the FSC Principles & Criteria, as elaborated by the FSC Lake States Regional Standard. As the scope of these certification standards covers bio-physical issues, socio-economic issues and organizational/financial issues, the due diligence designed to properly inform the audit team includes the following modes of information and data collection:

- Review of pertinent documents
- Interviews with DNR and County personnel covering a wide range of disciplines
- Consultation with individuals and organizations that consider themselves to be “stakeholders” in public lands forest management in Wisconsin

- On-site inspections of forest conditions and forest management operations (including but not limited to timber management operations) were based upon a stratified random sample, first of Counties, and then of properties within selected Counties. For each County sampled, specific field sites visited included some that were randomly selected and others that were proposed by County Forest personnel and/or non-randomly selected by the audit team.

Stakeholder consultation began 30 days prior to the field component of the evaluation, via a written notice that was sent out to a broad cross-section of stakeholders. In addition to the 30-day notice, members of the audit team began to make one-on-one contacts with selected stakeholders in Wisconsin and the Lake States region. DNR and Counties selected in the sample provided the audit team with a list of and contact information for those stakeholders most interested in County Forest management.

2.3.1 Main Items and Places Inspected

The field portion of the evaluation took place from September 27 through October 5, 2004. In total, 35 person days of in-state evaluation time were expended by members of the audit team. The field audit included:

- office based interviews/discussions, in Madison and 6 County offices
- telephone and face-to-face interviews with a sample of stakeholders
- site inspections of a variety of sites designed to illustrate a cross-section of stand types and treatments, focusing on harvests and other site-disturbing activities conducted within the last several years
- the audit team visited 5 of the 16 County Forests seeking enrollment in the FSC Group. Note the team actually visited six counties; however, one of the six elected not to pursue FSC certification at this time.

Mon. Sept. 27, 2004 Madison- State Offices

Office Interviews and Document Review

Tue. Sept. 28: Wood County

Wood County Offices

Timber Sale #513: Rifle Range White Pine Sale

- raptor surveys
- residual damage
- thinning- post treatment stocking
- skid trail layout and BMP's
- forest access

Timber Sale #573: Red and white pine stand (3rd entry)

- roads and skid trails
- timber sale administration
- silviculture- long term plan

Timber Sale #572

- lower site quality for aspen

boundary painting
watercourse protection

Timber Sale #573: Aspen clearcut (7-years old)

Lunch at Dexter Park

Timber Sale #579: North Hemlock Creek
tree felling
BMP's
snag & den tree retention
watercourse restoration
unique species protection- observed Heron rookery within protection zone

Timber Sale #510: South Bluff Aspen - special management area
aspen regeneration

Timber Sale #575: Smith Bluff Timber Sale
overstory removal to restore pine (marked but uncut)
light thinning around bluff
snag and cavity tree

Wed. Sept. 29 - Douglas County

Timber Sale #3377: 93-acre aspen clearcut/hardwood thinning
cut tree selection
snag/den tree selection criteria- differences between foresters
temporary intermittent stream crossing (timber mat)

Timber Sale #3415: 40-acre aspen clearcut
summer harvesting- rutting and compaction
leaving aspen retention strips for aesthetics and water protection

Timber Sale #3483: 45-acre aspen clearcut
harvest adjacent to Black Lake Bog Scientific Natural Area
foresters worked with WDNR biologist to address any concerns regarding the SNA
regeneration

Timber Sale #3456: 25-acre aspen clearcut
spring cut aspen
effective permanent stream crossing using temporary timber bridge
rutting/compaction problems
fines levied for cutting spruce outside of contract specifications
no whole-tree chipping in order to maintain slash and minimize erosion on steep slopes

Timber Sale #3566: 8-acre red pine plantation thinning
second thinning; selection for harvest; residual basal area

Timber Sale #3505: 62-acre hardwood/birch shelterwood and thinning
active harvest
stream buffer and vernal pool set asides

whole tree chipping operation provides scarification for birch seed germination

Timber Sale #3369: 36-acres aspen clearcut and hardwood thinning
harvesting unfinished; contractor defaulted
winter cut, skidding through wet areas

Timber Sale #3385: 72-acre aspen clearcut and hardwood thinning
wood mat bridge over drainage – excellent implementation
designated streamside management zone
retained low-quality yellow birch for den trees
winter cut;

Timber Sale #3425: 23-acre natural pine thinning
active sale; careful harvest
tree selection for harvest
same coverytype as harvest area located across the road was maintained as “old-growth” area

Additional Douglas County Sites Visited Include:

B-1 Sale 3496 Tract 54-02 “Plugged Gun Pine” 34 acres
B-2 Sale 3331 Tract 42-00 “Etiennes Red Pine” 71 acres
B-3 Sale 3568 Tract 35-03 “T.P. Pine” 54 acres
B-4 (lunch site) Gordon Dam Park
B-5 Sale 3523 Tract 62-02 “Running Deer Hardwoods” 46 acres
B-6 Sale 3476 Tract 17-02 “TV Farm Aspen” 60 acres
B-7 Empire Grade Ruff Grouse and Woodcock Management Area
B-8 Sale 3545 Tract 14-03 “Squirrel Trail” 37 acres
B-9 Cranberry Flowage
B-10 Sale 3576 Tract 57-03 “Post Oak Two” 54 acres

Thur. Sept 30- Iron County

B2, B3, B4, B5

Timber Sale #2196: 32-acre northern hardwood
high visibility area along highway 51

Timber Sale #2140: Mixed red pine, aspen hardwood
logged in spring- rutting
structural diversity
snowmobile trail
den and cavity tree retention

Timber Sale #2174: 29-acre mixed hardwood and conifer
rutting in wetland areas- not flagged
riparian area protection- loggers on ridge
high herbivory on red maple
regeneration concerns

Timber Sale #2153: 63-acre Northern Hardwood harvest

legacy spruce tree
strong focus on snags, den trees, vertical structure

Timber Sale #2182 110-acres of Northern hardwood actively being cut.
second thinning to remove mature timber – target 75 SF BA/acre
discussed stand structure, lack of retention of larger yellow birch, and making sufficient openings to encourage other species regeneration
discussed high stumps and residual damage

Timber Sale #2111 110-acres Northern hardwood actively being cut

- part cut summer (some ruts) part cut winter (no ruts or compaction)
- tree marking actual versus Silviculture Manual guidelines

Timber Sale #2122 Northern hardwood harvested 2 years ago

- harvested with wheeled shear, large grapple-skidder
- initial entry into second growth stand reduced BA from 120 to 70-75

Timber Sale #2169 Tract 28-02 301 acres

- varied types of marking in large Northern hardwood stand
- loggers concerned that too much big wood left behind, and county foresters agreed, but state liaison and county Administrator prevailed and did not mark more trees

Other Issues Covered:

non-timber forest products

reserves: Penoke Biological Area “no harvest” zone 1,500 acres

habitat work by DNR Biologists on Iron and Ashland County Forests (10 cent fund)

research by intern: deer browse comparison- years since harvest, regeneration, percent browse data being collected

financial vs. biological decision-making criteria for forestry decisions

stand level retention criteria

internal controls – liaison oversight

Fri. Oct. 1 Taylor County

Timber Sale #510: 64-acre aspen clearcut

excellent regeneration

attention to difficult to regenerate species (white birch)

Timber Sale #536: Salvage and northern hardwood thinning

harvest along ice age trail

leave larger diameter and longer lived species (trail aesthetics)

no-cut buffer along stream in place

Wood Lake Park: 320-acre park surrounding lake (special management area)

campgrounds

lake- no motor boat ordinance passed by township

Timber Sale #529: 52-acre selection in northern hardwoods and 2-acre aspen clearcut

suggestion to tally by stand instead of timber sale- providing historical information

wetland and riparian areas protected minimal rutting (cut November)

Timber Sale #529 B: 27-acre Tamarack Regeneration

retention- mostly dispersed- some clumped

creating rare- young larch stands

regeneration excellent

no discussion with hydrologist or endangered resources regarding rare plant communities

Timber Sale #541: 28- acre red pine plantation

timber education signs along snowmobile route “year planted, 1st thinning, 2nd thinning”

light entry- high standing BA

excellent oak regeneration

Timber Sale #548: 10-acre aspen clearcut, 45 acre northern hardwood

unauthorized ATV use despite signage and gating

wildlife tree retention (large diameter, low value, hollow)

Timber Sale #545: 10-acre northern hardwood/white birch and 18 acres mature aspen fir

Logger interview

Timber Sale #521: 28-acre white birch regeneration

shelterwood

aspen, pine spruce, oak, hemlock, tamarack, white birch seed trees retained

white birch regeneration failed- some aspen

Timber Sale #521: 54-acre white birch and 21 acre aspen (marked-uncut)

plan to regenerate white birch using shelterwood and scarification

attempt to regenerate difficult species

Timber Sale #517: 61-acre aspen clearcut

some minor rutting- had to force operator off

regeneration

little retention- though rare for county to have large open clearcut

Gerstberger Pines- 20-acre old growth pine and hemlock conservation area

Sat Oct. 2 Clark County

Timber Sale #649: 55-acre hardwood thinning
intermediate thinning, salvage aspen
no tree length skidding
excellent pine regeneration

Timber Sale #1002: firewood sale
11 cord maximum limit set on firewood sales and no commercial cuts
area designated because of low quality timber and dry site
important to allow for public relations
little timber sale administration
safety concerns- though County does not address them

Area Identified for late seral pine
on wet ground pine site identified an opportunity for extended rotation 180-200 years
current stand age 75 years

Sand Rd- Herbicide Spray
re-inventory process used to identify sites needing release
used arsenal/glyphosate mix
conducted seedling survival checks
treatments have public review during annual work plan

Timber Sale #1097: 55-acre mixed hardwood and pines
oak wilt infected
objective reduce risk of oak wilt spreading
marking of wildlife trees
regeneration

Timber Sale #441: 73-acre aspen regeneration
frozen ground logging restriction
logger fined for rutting
retention islands and marking of individual wildlife trees
high ATV use

Lunch- Maintenance Facility –
Chemical storage inspection

Invasive exotic knapweed and leafy spurge control work
areas identified in GIS-
funding through sustainable forestry monies
all high priority invasive areas addressed except riparian

Timber Sales #640 and #1068: 28-acre jack pine and aspen regeneration
Karner Blue Butterfly – HCP plan was followed; considered timing of operation, shifting mosaic to
ensure habitat, and increase of early seral and lupine
regenerate aspen and jack pine and enhance Karner Blue

Timber Sale #577: 71-acre pine thinning and 9-acre regeneration cut
unexpected aspen regeneration
overall goal continue pine management

Timber Sale #516: 14-acre selective harvest
maintain and perpetuate oak type
residual BA
heavy to red maple in regeneration

Sun. Oct. 3 Oconto

P.M. team synthesis and scoring

Mon. Oct. 4 Oconto County

County Forestry Shop

- view chemical storage shed, equipment shed and equipment used in forestry operations

Jack Pine Planting Site along County Hwy. S

- example of past jack pine regeneration efforts
- herbicide used at site to release jack pine

Timber Sale #36-02: 23-acre jack pine clearcut.

- will be reevaluated after harvest with objective of replanting to jack pine.
- significant buckthorn invasion at site.

Timber Sale #25-01: 37-acre hardwood thinning being managed for hardwood sawtimber.

Timber Sale #65-04: 60-acre aspen clearcut with intent to regenerate site to aspen.

Timber Sale #941-99: 50-acre aspen clearcut in four units with intent to regenerate site to aspen.

- BMP riparian zone buffer along Brehmer's Creek instituted.

Tue. Oct. 5 Wausau

A.M. team synthesis and scoring

P.M. results presentation; exit briefing

2.3.2 Justification for selection of items and places inspected

The field itinerary was expressly laid out so as to provide the audit team with a solid exposure to the breadth and variety of forest conditions and management activities undertaken on the County Forests seeking enrollment in the FSC Group. The team visited 6 of the 18 Counties seeking FSC certification- however 1 of the 6 visited decided not to pursue certification after the field portion of the evaluation. For 2 of the Counties visited the team divided into two separate teams to double the number of sites visited in those Counties. Two additional Counties (Washburn and Eau Claire) seeking enrollment into the FSC group were visited during a preliminary assessment in November 2003. In selecting field sites to inspect, the team endeavored to examine recent and older site disturbing projects (e.g., regeneration harvests, commercial thins, pre-commercial thins, planting sites), planned harvesting operations, road construction and maintenance activities, active logging operations, etc. The audit team also overviewed non-timber aspects of County forest management such as recreation facilities (e.g., campgrounds), bogs, bluffs, and other reserve areas. At the beginning of each field day, the audit team engaged in a 1-2 hour in-office interview and discussion with County and DNR staff attached to each County forest. The evaluation team was satisfied that the on-site field inspections of County forest management operations were sufficient in scope and intensity for reaching an informed certification decision.

2.4 STAKEHOLDER CONSULTATION

2.4.1 Summary of Legal and Customary Use-rights

County Forests are public land; as such, there are statutorily established public use rights that exceed those associated with privately-owned forests. Most notably, County Forests are accessible to the general public for outdoor recreational activities such as hiking, hunting, fishing and camping.

As guided by the Public Forest Lands Handbook (HB 2460.5), there are additional special uses allowed on a permit basis on the selected areas within the County Forests, including:

- Military Maneuvers
- Rifle Ranges
- Land Use Agreements/Easements
- Mineral Exploration, Prospecting, Mining
- Sand and Gravel

With regard to customary uses, the most notable are associated with tribal activities, as defined by the Chippewa Treaty Rights, including:

- Gathering of firewood, boughs, tree bark, lodge poles, marsh hay, and maple syrup
- florals, medicinals and other vegetation
- Hunting and fishing independent of activities allowed under the State fish and game code

2.4.2 Identification of Stakeholders Influenced by the Enterprise and Description of Consultation

Pursuant to SCS protocols and FSC requirements, consultations with key stakeholders were an integral component of the evaluation process. Consultation took place prior to, concurrent with, and following the field evaluation. The following were distinct purposes to the consultations:

- 1) To solicit input from affected parties as to the strengths and weaknesses of management of the County Forest Program FSC Group and the nature of the interactions between County and DNR personnel and the surrounding communities as well as “communities of interest” (e.g., sportsmen’s organizations, recreational groups, environmental and conservation organizations).
- 2) To solicit input on whether County Forests together with DNR have consulted with stakeholders regarding the identification of areas of high conservation value within the County Forests enrolled in the FSC Group.

The following procedural steps were taken in the stakeholder consultation process:

- A list of stakeholder groups and individuals was compiled from numerous sources, including:
 - A request that WDNR and Counties seeking FSC Certification provide SCS with a list of the most active stakeholder groups that it deals with
 - A review of responses received to the Notice of Evaluation that was broadly distributed 30 days prior to the field audit
 - Compilation of additional contacts and stakeholder groups by soliciting names from key contacts in the region
- The “master list” of stakeholders was then analyzed and categorized into the three FSC chambers: social, environmental, and economic
- Direct contact was made, initially by telephone or email, by one of the audit team members
- The interviews, most commonly conducted over the telephone, followed a general script that was prepared by the team leader (lead auditor). The script included a general summary of the process and the purpose of the interview. Each interviewee was invited to offer either positive or negative comments. Notes were taken for each interview and are maintained in the SCS files for this project.
- Input received during the stakeholder interviews was shared with all members of the audit team as part of the daily preparation during the week of field audits. As appropriate, issues arising during stakeholder interviews were raised in discussions with DNR and County personnel.

2.4.3 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable

General Stakeholders

Comment/Concern	Response
<ul style="list-style-type: none"> A repeated comment from a few stakeholders (whose interest level spans multiple or all Counties) is a desire for more opportunities to work with Counties together as one group or in several regional groups rather than working with each County on a one-on-one basis. 	REC 2004.1
<ul style="list-style-type: none"> Opportunity for involvement in 10-year planning process is good 	Noted

Environmental/Forest Health Stakeholders

Comment/Concern	Response
<ul style="list-style-type: none"> Counties seeking FSC, with potential Karner Blue butterflies, have been very strong partners 	Noted
<ul style="list-style-type: none"> Deer impacts on regeneration of herbaceous and certain tree species 	Topic was discussed with staff; Rec 2004.6
<ul style="list-style-type: none"> More inventory of biological resources needed on County Forests 	Noted
<ul style="list-style-type: none"> There should be less early successional forest cover 	Team considered this comment, and concluded Counties enrolling in FSC Group are appropriately balancing economic and ecological issues in determining % of early seral;
<ul style="list-style-type: none"> Roughly two thirds of Counties (seeking FSC group certificatio) have had some interaction with Bureau Endangered Resources (BER) in identifying, researching, or establishing representative samples/special management areas/State Natural Areas. The level of interaction between these individual Counties and BER has varied from limited discussions to an extensive biological inventory and gap 	Team confirmed non-conformance, stipulated CAR 2004.5

assessment	
<ul style="list-style-type: none"> • Opportunities for Counties to make significant contributions to the region's High Conservation Value Forest by ensuring a continued working forest that engages in cautious management and safeguards when needed. Key HCVF identified includes Iron County Penoque Range and large intact hardwood, Ashland Bad River buffer, Bayfield barrens). 	Team confirmed non conformance- CAR 2004.10 and CAR 2004.11 address this by requesting Counties expand on efforts to identify and conserve HCVF.
<ul style="list-style-type: none"> • Would like to see more remote lakes restricted to "walk in access only" to minimize spread of exotics 	Addressed with REC 2004.9
<ul style="list-style-type: none"> • Counties pro-active in utilizing regional forest health specialists 	Noted
<ul style="list-style-type: none"> • An aggressive effort is needed to control invasive exotic species- getting County citizens actively involved is critical 	REC 2004.8
<ul style="list-style-type: none"> • Rotations should be longer 	Team notes rotations are already notably longer than industrial norms, and feels adequate balance of economic environmental interest

Sportsmen, Recreation User Groups

Comment/Concern	Response
<ul style="list-style-type: none"> • County Forests generally quite good at maintaining early successional habitat 	Noted
<ul style="list-style-type: none"> • County Forests/DNR and user groups healthy working relationship 	Noted
<ul style="list-style-type: none"> • Extensive State paperwork associated with cost share program for User Groups is burdensome 	Noted- though beyond the scope of FSC
<ul style="list-style-type: none"> • Counties should facilitate more opportunities for ATV use 	10-year planning process will include a more detailed access plan for those counties that have not already completed one.

Community Groups & Local Residents, Including Indigenous Peoples

Comment/Concern	Response
------------------------	-----------------

<ul style="list-style-type: none"> Concern that Foresters are aware of and take proper precaution for avoiding burial mounds One Tribe mentioned they would like to see maps of proposed timber sales as early as possible in advance to be able to review for archeological sites 	Team confirmed non-conformance addressed by CAR 2004.1
<ul style="list-style-type: none"> Counties are not systematically screening the State Historical Society Database for archaeological sites prior to beginning ground disturbing activities 	Team confirmed non-conformance Addressed by CAR 2004.1, and CAR 2004.3

Employees and Contractors:

Comment/Concern	Response
<ul style="list-style-type: none"> foresters that administer sales are generally quite good at balancing ecological and economic considerations 	Noted
<ul style="list-style-type: none"> Nearly all of the Wisconsin loggers interviewed expressed high job satisfaction and reported above average compensation Most reported receiving some amount of company medical insurance, adequate training opportunities, and some reported good opportunities for advancement Owners of small logging companies (5 or fewer employees) reported that prices for stumpage were so high that they were having difficulty competing successfully for contracts. 	Noted
<ul style="list-style-type: none"> All forest workers interviewed had positive statements about working with county forests, and were supportive of the way programs are run. 	Noted
<ul style="list-style-type: none"> Overall DNR and County compensation packages are attractive even though salaries may be slightly below comparable positions elsewhere 	Noted
<ul style="list-style-type: none"> Good variability in sizes of sales being offered, which provides opportunities for the full range in size of purchasers and loggers 	Noted
<ul style="list-style-type: none"> Budget-induced reductions in DNR workforce has meant that remaining staff must do more with less 	Noted

2.5 GUIDELINES/STANDARDS EMPLOYED

For purposes of determining the applicable FSC standard, the State of Wisconsin is located in the “Lake States Region,” one of 9 regions delineated by the FSC in the U.S. The certification evaluation of the County Forests, therefore, was conducted against the duly-endorsed *FSC Lake States Regional Standard*. The standard is available at the FSC-US web site or is available, upon request, from Scientific Certification Systems.

2.6 SCORING PROCESS

Consistent with SCS Forest Conservation Program evaluation protocols, for scoring purposes the team collectively assigned weights of relative importance to the Criteria within each of the ten Principles. Scores were assigned to each Criterion at the completion of the field phase and importance-weighted means (average scores) were calculated for each Principle. Scoring takes place on a 100-point scale, using a consensus process amongst all members of the evaluation team. Scores less than 80 points connote performance in which there is discernible non-conformance to the breadth of a Criterion. For any Criterion for which the team assigns a score below 80 points, the team is required to specify one or more Corrective Action Requests (CARs), also known as “conditions.” If the weighted average score of any Principle is less than 80, certification cannot be awarded and, instead, the evaluation team must stipulate one or more Major Corrective Action Requests (Major CARs), also known as “pre-conditions.” The evaluation team also retains the option to specify “discretionary CARs” even when the score for the pertinent Criterion is above 80 points. This may occur when, overall, the Criterion was highly scored but there are issues within the scope of an Criterion where important improvements are, in the judgment of the team, necessary even though these deficiencies are not severe enough to move the score below 80 for the totality of the Criterion. For certification to be awarded, the importance-weighted average score for each of the 10 FSC Principles must be 80 points or higher.

Interpretations of Preconditions (Major CARs), CARs and Recommendations

Preconditions/Major CARs: These are corrective actions that must be resolved or closed out prior to award of the certificate. These arise when the importance-weighted average score for a Principle is less than 80 points or where there is observed non-compliance with a “pre-emptive” indicator (e.g., use of GMOs is a “fatal flaw” that precludes award of certification regardless of the strength of the overall management program).

CARs: Corrective actions must be closed out within a specified time period of award of the certificate. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

Recommendations: These are suggestions that the audit team concludes would help the program move even further towards exemplary status. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations can be changed to CARs if performance with respect to the criterion triggering the recommendation falls into non-compliance.

3.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS

Table 3.1 below, contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of Forest Stewardship. The table also presents the calculated performance scores for each Principle as well as the corrective action request (CAR) numbers related to each Principle.

**TABLE 3.1 NOTABLE STRENGTHS AND WEAKNESSES OF THE FOREST MANAGEMENT ENTERPRISE
RELATIVE TO THE P&C**

Principle/Sub ject Area	Strengths Relative to Standard	Weaknesses Relative To Standard	Performance Score and CAR/REC #s
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> Counties have an exemplary record of complying with regulatory requirements Counties are in conformance with Chippewa and other Treaty rights PILOT payments are routinely in a timely fashion; DNR carries out financial audits of Counties helping to ensure payments are made Timber theft and other unauthorized activities are minimized through monitoring and aggressive prosecution Counties either have developed comprehensive access plans or will be doing so in the next planning cycle A number of Counties have recreation officers. 	<ul style="list-style-type: none"> Many of the County Programs have significant problems with unauthorized ATV use Individual Counties have yet to make explicit commitments to FSC 	Score= 90 Major CAR 2004.1 (Closed March 1, 2005)
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> Affected land boundaries are clearly identified on the ground prior to commencement of management activities The laws of the State of Wisconsin provide clear avenues (e.g., the state courts) of recourse for citizens to air and resolve any grievances regarding tenure and use rights. County Forests clearly have the long-term right to manage their forests County forests offer exceptional public use 	<ul style="list-style-type: none"> Modes and frequency of consultation with relevant Tribes needs improvement A written dispute resolution process is not made available to the public County forest boundaries, outside of timber sales, are often not painted 	Score=89 CAR 2004.1

	<p>opportunities for a large variety of activities</p> <ul style="list-style-type: none"> Counties take steps to notify adjacent property owners of upcoming timber sales in an effort to agree on property lines and mitigate potential problems Monthly Forestry Committee meetings are available and utilized as a means to avoid and resolve disputes 		
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> Planning process is open to all of the public- as such Tribes have had opportunity to participate Some Counties have made explicit efforts to consult with Tribes Responsibilities with respect to Treaty Rights are briefly discussed in the 10-year plan For sites that have been identified, information is securely kept in confidence 	<ul style="list-style-type: none"> Counties are not systematically consulting with Tribes No systematic process in-place for Counties to conduct archeological database searches, either through State Historical Society or other resources 	<p>Score= 75</p> <p>Major CAR 2004.2 (closed February 9-2005)</p> <p>CAR 2004.1 CAR 2004.3</p>
P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> Through a suite of key services such as commercial timber production, outdoor recreation and habitat maintenance, the County Forests clearly are generating important opportunities for the citizens of Wisconsin and neighboring states Counties intentionally vary sizes of timber sales to allow access to local companies of varying sizes All logging contractors interviewed had received logger training, such as through FISTA; There is opportunity for public consultation during the 10 year planning process and during the monthly Forestry Committee meetings As key issues arise, e.g., access planning, public input is sought 	<ul style="list-style-type: none"> Counties visited did not have active safety programs- e.g., safety meetings and or appointed safety officer Although there is a clear dispute resolution process in place- it is not formalized in writing and made available to interested parties 	<p>Score= 89</p>

P5: Benefits from the Forest	<ul style="list-style-type: none"> County forests have a long-track record of continued support of long-term forest management Approx. 85% percent of net growth is harvested based on FIA data, thus harvest is not depletionary The County Forests are clearly not pushing their harvest activities to biological limits. Rotation ages are either at the standard for the region or, in many cases, exceed commonly accepted ages. The dedicated revenue source for forestry (0.2% real estate tax) is stable and generates an assured revenue stream Strong emphasis on utilization and value recovery during timber sales All forests- visited sold a broad range of products including veneer, sawtimber, pulpwood, non timber forest products 	<ul style="list-style-type: none"> DNR Wildlife budget has been drastically reduced in recent years Demand on County and DNR staff and resources to manage recreation, which typically does not generate revenue, continues to increase and at some point could seriously detract from timber management activities. Because the Counties sell nearly all of its timber to the highest bidder through lump sum bids, they are not able to give preference to local, financially competitive facilities for value-added processing and manufacturing 	Score= 87 REC 2004.2
P6: Environmental Impact	<ul style="list-style-type: none"> Full environmental assessments are conducted as part of the 10 year planning process BMP's and water regulations being applied throughout County system The NHI database is actively utilized on all County Forests Substantial time and resources have been placed on protecting and managing rare, threatened and endangered species as significant resources of the County Forests (e.g., Karner Blue Butterfly, 	<ul style="list-style-type: none"> Environmental Assessments at the project level should be expanded Limited training of field staff in recognizing sensitive species Very little surveys or screening done on rare, sensitive plant species Most planning is done at the stand level with no structured consideration of the broader 	Score=86 CAR 2004.4: CAR 2004.5 CAR 2004.6: CAR 2004.7: Rec 2004.3 Rec 2004.4 Rec 2004.5 Rec 2004.6

	<p>Wolves)</p> <ul style="list-style-type: none"> County forests predominantly utilize natural regeneration DNR Bureau of Endangered Resources (BER) actively conducts analyses of the adequacy of the current network of reserve areas in Wisconsin County Forests are not dependent on chemicals for their silvicultural activities Forest conversion to plantations or non-forest land uses does not occur 	<p>landscape</p> <ul style="list-style-type: none"> Extensive biotic inventories, as done on many State forests, has only occurred on one County Forest County Forest Program (FSC enrolled members) have not completed process with BER to assess needs and opportunities for Counties to contribute to the regions representative samples of existing ecosystems Counties do not develop written prescriptions for pesticide applications More education in identification of invasive exotic plants is needed 	<p>Rec 2004.7 Rec 2004.8 Rec 2004.9</p>
P7: Management Plan	<ul style="list-style-type: none"> Counties management plan template for next planning cycle is comprehensive, complete, and well-documented, with respect to relevant Indicators Silvicultural prescriptions use the Habitat Classification System and the National Hierarchy of Ecological Units Plans are revised every 10-years; when compared to the schedule of the State Master Plans- this is very notable. 	<ul style="list-style-type: none"> There is an opportunity to better utilize the extensive body of handbooks and other planning documents available from DNR Training of forestry staff in landscape level planning, multi-age hardwood management, invasive exotic plants, rare/unique plant communities, and cultural resources needs to be enhanced 	<p>Score= 84 CAR 2004.8</p>

P8: Monitoring & Assessment	<ul style="list-style-type: none"> ▪ Management goals and objectives are monitored through County Forest Recon, pre-harvest inventory systems, timber sale close out inspections, as well as various ecological monitoring conducted by WI DNR ▪ FIA system (1 plot per 3000 acres- 700 plots on county forests) is statistically relevant for County Forest Program as a whole (though not at individual County level) ▪ Deer counts, raptor surveys, Karner Blue surveys, wolf and other wildlife surveys/monitoring are conducted on County Forests by WDNR staff ▪ Recon updates lead to periodic adjustments in the allowable harvest levels 	<ul style="list-style-type: none"> ▪ Considering the large size and complex nature of the County Forests management, the frequency and intensity of monitoring is below FSC standards ▪ Unexpected effects of management activities (e.g., changes in growth rates, species composition, stem quality, etc.), are only loosely, if at all, monitored ▪ There is no systematic regeneration monitoring (except on planted stands) ▪ County Forests currently do not produce summaries of monitoring results 	Score: 82 CAR 2004.9 Rec. 2004.10
------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------

<p>P9: Maintenance of High Conservation Value Forest</p>	<ul style="list-style-type: none"> ▪ Many County Forests have identified and are conserving forest types/areas that qualify as HCVF, e.g., Karner Blue, barrens communities, State Natural Areas, scenic river ways, ice age trail, bluffs, hemlock, white pine communities, etc. ▪ County Forest system as a whole, was built from a highly denuded landscape, and as a result contains low amounts of pristine/unique forests ▪ Experts outside of the County Forest program, primarily BER, are used extensively ▪ Forestry committee meetings and the 10-year planning process are used to gain public input on all of County Forest management, including areas for conservation ▪ Areas qualifying as HCVF, which have been identified, have been well protected ▪ DNR has many excellent resources (e.g., Ecological Landscapes Handbook, NHI,) and well qualified staff (Bureau of Endangered Resources) needed to guide management of HCVF. 	<ul style="list-style-type: none"> ▪ DNR's wide array of available resources to guide identification and management HCVF are used only sparingly by some Counties ▪ There is a wide variability among Counties in the level and efforts to identify and protect HCVF ▪ The public has not been expressly consulted about HCVF on County Forests ▪ There is no express treatment of HCVF in the 10-year plans ▪ No systematic approach to monitoring status of already identified HCVF on County Forests and the effectiveness of measures employed to maintain it 	<p>Score = 80 CAR 2004.10 CAR 2004.11</p>
---------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Group Administration	<ul style="list-style-type: none"> ▪ WI DNR, the group entity, is clearly a competent forest management agency. The group entity is further strengthened by the Wisconsin County Forests Association, which provides a very effective mechanism for the consideration of problems and policies of concern to the Counties. ▪ Assigning a DNR Liaison forester to every County, with authority over sale and other functions, results in a strong internal control system 	<ul style="list-style-type: none"> ▪ A procedural step that needs to occur prior to award of certification (Major CAR 2004.1) is that Counties wishing to enrol in the group must provide a formal written authorization agreeing to be included in the FSC group scheme administered by the DNR ▪ The Group Manager's (WI DNR) system to monitor Group Member compliance with certification requirements needs to be formalized and made explicit. 	Score =90 Major CAR 2004.1 CAR 2004.2
-----------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------

3.2 CERTIFICATION RECOMMENDATION¹ AND JUSTIFICATION

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team recommends that the Wisconsin County Forest Program, as managed by the Wisconsin Department of Natural Resources, be awarded FSC certification with specified Corrective Action Requests. This recommendation is based upon the audit team's finding that there are currently no outstanding Major CARs.

3.3 PEER REVIEWERS

After first undergoing review by DNR and Counties, the following peer reviewers provided technical comment on the review draft of this evaluation report:

Dr. John Kotar, Forest Ecologist, University of Wisconsin

Cal Mukomoto, Forestry Consultant

The evaluation team carefully considered the comments provided by the peer reviewers and made changes, as deemed appropriate, in response to those comments. The peer review comments are the personal professional opinions of the experts that submit comments and do not constitute the opinions or positions of the organizations with whom they are employed.

3.4 PROPOSED CARs ATTACHED TO CERTIFICATION

Background/Justification: Counties that have been part of the FSC certification evaluation process have not yet provided a written authorization to be included in the FSC group scheme administered by the DNR and, in doing so, to make a commitment to manage their forests in conformance to the FSC P&C.	
Major CAR.2004.1	Prior to the award of certification, counties that wish to enrol in the group scheme must individually provide to WI DNR written authorization and a commitment to manage in accordance with the FSC P&C. WI DNR may provide a standardized form that each participating county signs.
Reference	<i>SCS Group Criterion D.2 and FSC Criterion 1.6</i>
Deadline	Prior to award of certification

Closed March 1, 2005. All 16 Counties seeking FSC certification have documented their commitment to FSC through Committee minutes and/or County Board resolutions as of March 1, 2005.

¹ Under SCS/FSC protocols, audit teams do not render formal certification decisions; that responsibility rests with the SCS Certification Committee. Rather, the audit team formulates a recommendation that is centrally considered by the SCS Certification Committee.

Background/Justification: Collectively, WI DNR and the counties are not systematically consulting with Tribes regarding protection of cultural resources.	
Major CAR.2004.2	<p>Prior to the award of certification, the Wisconsin County Forest Program (WCFP) must identify Tribes with customary use rights or other legal use rights to the management area. Participating counties, or the WI DNR on the counties' behalf, must invite relevant Tribes to participate in the planning process, particularly planning related to identification and protection of Tribal resources, including treaty rights and cultural and archaeological sites</p> <p>Note: This Major CAR will be considered met upon the participating counties providing a complete list of relevant Tribes and, either the counties or the WI DNR, providing evidence (notes from a phone conversation and/or copy of written correspondence) of an initial solicitation inviting their participation in the planning process.</p>
Reference	<p><i>3.2.a. Forest owners or managers identify and contact American Indian groups that have customary use rights or other legal rights to the management area and invite their participation in the forest planning processes"</i></p> <p><i>3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.</i></p> <p><i>3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance. They invite participation of tribal representatives (or other appropriate persons, where tribal entities are lacking) in the identification of current or traditionally significant sites within the forest proposed for certification.</i></p> <p><i>3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.</i></p>
Deadline	Prior to award of certification

Closed February 09, 2005. On January 8, 2005, Wisconsin County Forests sent letters to 11 Tribes (as well as Great Lakes Indian Fish and Wildlife Commission GLFWC) deemed to be potentially interested in management of the County Forests. The letters provided contact information for the County Administrators, described the County Forests, the County Forest planning process, and invited participation on identifying

archaeological and cultural resources. With these actions the Wisconsin County Forest Program has complied with Major CAR 2004.2.

The effectiveness of this initial consultation will be a point of attention during future surveillance audits. Should the current mailing approach not function as intended, Wisconsin County Forests should look for other methods and opportunities to try and engage Tribes. As discussed in the peer review from Cal Mukomoto- similar outreach efforts to Tribes in the Pacific Northwest did not achieve the intended objective because Tribes were hesitant to respond without personal contact.

Background/Justification: Collectively, WI DNR and the counties are not systematically consulting with Tribes regarding protection of cultural resources.	
CAR.2004.1	At the year 1 surveillance audit (approximately 12 months from award of certification), participating counties, or the WI DNR on the counties' behalf, must demonstrate how input received from Tribes was considered and utilized to improve identification and protection of Tribal resources, including treaty rights and cultural and archaeological sites.
Reference	<p><i>3.2.b. Steps are taken during the forest management planning process and implementation to protect tribal resources that may be directly affected by certified operations such as adjacent lands, bodies of water, critical habitats, and riparian corridors as well as other resource uses such as rights to hunt, fish, or gather.</i></p> <p><i>3.3.b. Forest owners and managers consult with tribal leaders (or other appropriate persons, where tribal entities are lacking) to develop mechanisms that ensure forest management operations protect from damage or interference those areas described in 3.3.a. and incorporate these special places into forest management and operational plans.</i></p>
Deadline	Year 1 (approximately 12 months from award of certification) surveillance audit

Background/Justification: The Group Manager's (WI DNR) system to monitor Group Member compliance with certification requirements needs to be formalized and made explicit.	
CAR.2004.2	By the year 1 surveillance audit, the WCFP must expand on their current internal control system (i.e., DNR liaison responsibilities with respect to certification, internal audits, etc) to improve Group Member conformance with the certification requirements. The internal control system must include a system and provisions for DNR to identify and address Group Member non-conformances with the FSC standard.
Reference	<i>SCS Group Certification Criterion 3 "GM Oversight System"</i>

Deadline	Year 1 surveillance audit

Background/Justification: Counties are not systematically screening the State Historical Society Database for archaeological sites prior to beginning ground disturbing activities.	
CAR.2004.3	By the year 1 surveillance audit the Wisconsin County Forest Program must demonstrate that it is regularly utilizing the State Historical Society Database and other relevant resources to screen pending land disturbing activities for archaeological and historical sites.
Reference	<i>3.3.a. Forest owners or managers make systematic efforts to identify areas of cultural, historical, and/or religious significance...</i>
Deadline	Year 1 surveillance audit

Background/Justification: The team observed several incidents (all within one county) where northern hardwood silviculture prescriptions were being conducted in a manner clearly inconsistent with the Silvicultural Handbook and with commonly accepted northern hardwood management techniques.	
CAR.2004.4	By the year 1 surveillance audit, the WCFP must take necessary measures to ensure that DNR retains and fully uses its ability to execute authority over sale approval. Specifically, any significant deviations from the Silvicultural Handbook with respect to how northern hardwoods are managed needs to be identified and corrected.
Reference	<i>SCS Group Certification Criterion 3 "GM Oversight System"</i> <i>Principle 7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and....</i> <i>Criterion 6.3</i>
Deadline	Year 1 surveillance audit

Background/Justification: First, the team recognizes the Bureau of Endangered Resources (WI DNR) has done considerable work identifying and protecting representative samples across all of Wisconsin (including some counties), and that many individual counties have identified and designated special management areas and State Natural Areas. However, continued work on identifying possible representative samples on county forests is needed.	
CAR.2004.5	By the year 2 surveillance audit, WCFP must complete the following two phases to ensure full conformance to Criterion 6.4: Phase 1: WCFP must work with WI DNR Bureau of Endangered Resources to complete the assessment for gaps in representative samples

	<p>of existing ecosystems within the landscape that are best filled on county forests.</p> <p><i>Note: Endangered Resources has an approach for summarizing representative sample needs and opportunities by county using the Ecological Landscapes Handbook, Regional Ecological Assessments, Community Restoration & Old Growth, Wisconsin Land Legacy Study, and Nature Conservancy's Great Lakes Ecoregional Plan</i></p> <p>Phase 2: WCFP must initiate the process to formally recognize (this does not prohibit active management) any representative samples identified in Phase 1 that are unique to county forests and/or clearly best suited for SNA or some other form of special management designation on county forests.</p>
Reference	<i>Criterion 6.4</i>
Deadline	Year 2 surveillance audit

Background/Justification: Clear criteria for what constitutes unacceptable levels of rutting, compaction, and residual stand damage are lacking, thus making it difficult for counties to identify and take necessary measures when problems occur.	
CAR.2004.6	By the year 1 surveillance audit, the WCFP must establish clear written criteria for acceptable levels of rutting, compaction, and residual damage, and implement these criteria in their timber sale administration process.
Reference	<i>Criterion 6.5: Written guidelines shall be prepared and implemented to control erosion, minimize damage....</i>
Deadline	Year 1 surveillance audit

Background/Justification: Herbicides are applied without a written prescription.	
CAR.2004.7	By the year 1 surveillance audit a written prescription must accompany all herbicide and pesticide applications.
Reference	<p><i>Criterion 6.6.e. A written prescription, which includes a discussion of precautions and potential environmental effects, is prepared for each pesticide that is used.</i></p> <p><i>Criterion 7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are available to people who implement the prescriptions.</i></p>
Deadline	Year 1 surveillance audit

Background/Justification: Training of forestry staff in landscape level planning, invasive exotic plants, rare/unique plant communities, and cultural resources needs to be enhanced in order to carry out management that meets the full spectrum of the FSC standard, as well as to successfully carry out the 2005 10-year plan.	
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

CAR.2004.8	By the year 2 surveillance audit, the WCFP must expand training programs to include landscape level planning, identification and control of invasive exotic plants, identification and protection of rare/unique plant communities, and identification and protection of cultural resources. Note: “training” does not require formal classes/workshops in every instance; in many cases improving content and distribution of written training material may suffice.
Reference	<i>7.3.a. The forest owner or manager assures that workers are qualified to implement the management plan.</i>
Deadline	Year 2 surveillance audit

Background/Justification: Considering the large size and complex nature of the County Forest Program, the audit team found the frequency and intensity of monitoring to be insufficient to assure full and adequate conformance to the FSC certification standards, particularly Principle 8. A key clause in Criterion 8.1 is that “monitoring should be consistent and replicable over time to allow comparison of results and assessment of change”.

CAR.2004.9	By the year 1 surveillance audit, the WCFP must develop the framework for and begin implementing a program for consistent and replicable monitoring of changes in forest conditions, over time. Note, SCS understands that development and full implementation of the comprehensive monitoring program may take longer than 1 year and as a result SCS does not expect it to be complete at this time. As part of this monitoring program, the 10-year plan revision must include a section that discusses changes in forest condition since the last 10-year plan.
Reference	<i>Criteria 8.1 and 8.2</i>
Deadline	Year 1 surveillance audit

Background/Justification: Although many counties have identified and are protecting areas that would qualify as HC VF, the process completed to-date does not fully meet FSC Principle 9, nor has it been done consistently and systematically across all counties seeking FSC certification.

CAR.2004.10	By the year 2 surveillance audit, WCFP must expand upon the current HC VF process. Either the WI DNR staff or county staffs must define the attributes that merit designation as high conservation value (as set forth in Principle 9 of the Lake States Regional Standard) utilizing: <ul style="list-style-type: none"> • knowledge and information that county forestry and regional WI DNR staff possess regarding the local forest management area; • ecological targets in need of protection (detailed by the Bureau of Endangered Resources), which are derived from the Ecological Landscapes Handbook, Regional Ecological Assessments, Community Restoration & Old Growth, Wisconsin Land Legacy Study, and Nature Conservancy’s Great Lakes Ecoregional Plan; • NHI database; • information gained through consultations with Bureau of Endangered
--------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	Resources and other interested local and Statewide stakeholders.
Reference	Criterion 9.1 and 9.2
Deadline	Year 2 surveillance audit

Background/Justification: The WCFP lacks a sufficiently developed monitoring system for assessing the efficacy of management practices designed to maintain identified high conservation values found within the participating county forestlands.	
CAR.2004.11	<p>Phase 1: By the time of the year 1 surveillance audit WCFP must develop and implement monitoring protocols designed to assess the effectiveness of existing HCVF.</p> <p>Phase 2: By the year 2 surveillance audit, monitoring protocols to assess the expanded HCVF (resulting from CAR 2004.10) must be in-place.</p>
Reference	Criterion 9.3
Deadline	Phase 1: Year 1 surveillance audit; Phase 2: Year 2 surveillance audit

4.0 AUDITS

If certification is awarded, a brief surveillance visit will be conducted in March 2005 followed by a full scope surveillance visit in the 1st quarter 2006..

5.0 PUBLIC INFORMATION ABOUT THE FOREST MANAGEMENT PLAN AND MONITORING

Public information about WI DNR and the County Forests are available at:

<http://www.dnr.state.wi.us/org/land/forestry/index.htm>

<http://www.wisconsincountyforests.com/>.

A public summary of this monitoring report is available at www.scscertified.com.

SECTION B. DETAILED RESULTS OF THE FULL EVALUATION

SECTION B.1.0 DETAILED OBSERVATIONS & RESULTS

The SCS auditors conducting an evaluation of a group scheme must address two salient issues: 1) the competency of the group entity including the internal control system for assuring group member compliance with the requirements of certification (Section 1.1) and 2) the compatibility of the group members with the requirements of certification, as determined through a sample-based audit of field conditions (Section 1.2).

1.1 GROUP ENTITY/MANAGER ADMINISTRATION EVALUATION

CRITERION#1: GROUP ENTITY ORGANIZATIONAL COMPETENCY

This criterion focuses on the ability of the applicant to competently execute the duties and responsibilities of a Group Entity. Competency pertains to both group administrative functions as well as technical resource management of the group member forest management units.

CRITERION#2: REPORTING AND DOCUMENTATION

For this criterion, the focus is on the ability of the Group Entity to maintain all necessary documentation that describes the current status of the group as well as the management activities and resource conditions associated with each Group Member.

CRITERION#3: GROUP MEMBER OVERSIGHT SYSTEM—INTERNAL CONTROL SYSTEM

The focus of this criterion is on the mechanism and protocols by which the Group Entity maintains awareness of the activities of the Group Member and their ongoing compliance with the requirements of certification.

CRITERION#4: GROUP STABILITY AND CONTINUITY

Certifiable forest management presumes stable management regimes and continuity in commitment to exemplary practices. In the group certification context, a group that is highly fluid and subject to regular Group Member departures is simply inappropriate. While it is expected that the complementation of group members will change over time, the rate of change (turnover rate) should be moderate.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
Group. C1 Group Entity and Organizational Competency Score: 95	<ul style="list-style-type: none"> ▪ WI DNR, the group entity, is clearly a competent forest management agency. Wisconsin County Forests Association further strengthens the efficacy of the group entity. ▪ The DNR Liaison Foresters are professionally trained foresters. 	<ul style="list-style-type: none"> ▪ A repeated comment from a few stakeholders (whose interest level spans multiple or all Counties) is a desire for more opportunities to work with Counties together as one group or in several regional groups rather than working with each County on a one-on-one basis.
<p>Findings: WI DNR, the group entity, is clearly a competent forest management agency. The group entity is further strengthened by the Wisconsin County Forests Association, which provides a very effective mechanism for the consideration of problems and policies of concern to the Counties. The DNR Liaison Foresters (at least 1 forester assigned per county) and the institutional capacity of DNR, with its professional staff (hydrologists, pathologists, biologists, etc) and resources (GIS, Recon, nurseries) who and which are available to assist the County Forest program, together serve as the core to successful function of the group scheme. DNR provides funds 50% of the Forest Administrator's salary at each County, thus further strengthening the competency of the program. The specifics of this program are addressed in s. 28.11(5), Wis. Stats., and ss. NR 47.50 through NR 47.58, Wis. Adm. Code. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.</p> <p>Recommendation 2004.1: The WI County Forest Program should look for ways that individual Counties can work together as one group or regional groups to facilitate regional or statewide related stakeholder communications.</p>		
Group.C.2 Reporting & Documentation	<ul style="list-style-type: none"> ▪ Section 28.11, Wisconsin Statutes provides a written description of the responsibilities of DNR- with respect to oversight of County Forests. 	<ul style="list-style-type: none"> ▪ The scope of the DNR liaison with respect to monitoring County conformance to FSC Standards needs further elaboration ▪ Clear written rules and policies

Score: 85-pending Major CAR 2004.1	<ul style="list-style-type: none"> ▪ DNR maintains a highly organized and thorough record keeping system of County Forests. 	to correct group member non-conformance with FSC need to be developed
<p>Findings:</p> <p>Through Section 28.11 of the Wisconsin Statutes, DNR has clearly defined and documented its general roles and responsibilities with the County Forest Program. Documentation of the roles and responsibilities related to monitoring group member's conformance with FSC need to be further developed- see CAR 2004.2. A procedural step that needs to occur prior to award of certification (Major CAR 2004.1) is that Counties wishing to enrol in the group must provide a formal written authorization agreeing to be included in the FSC group scheme administered by the DNR. Upon meeting Major CAR 2004.1, the team will assign a score that connotes clear conformance with this criterion.</p> <p>Major CAR 2004.1: Prior to the award of certification, counties that wish to enrol in the group scheme must individually provide to WI DNR written authorization and a commitment to manage in accordance with the FSC P&C. WI DNR may provide a standardized form that each participating county signs.</p>		

Group.C.3 Group Member Oversight/Internal Control System	<ul style="list-style-type: none"> ▪ Assigning a DNR Liaison forester to every County, with authority over sale and other functions, results in a strong internal control system ▪ DNR liaison forester attends every forestry committee meeting- thus playing a critical role in stakeholder consultation. 	<ul style="list-style-type: none"> ▪ The Group Manager's (WI DNR) system to monitor Group Member compliance with certification requirements needs to be formalized and made explicit.
Score: 80		

Findings: By having DNR Liaison Foresters on staff at each County- the County Forest Program already has in-place a very strong internal control system. Some of the critical responsibilities of the liaison forester include:

- Personally render or arrange for appropriate Department technical assistance to be provided for county forest administration
- Administering the County Forest Law
- Participate in establishing annual goals for timber sale establishment
- Help formulate, investigate, and process applications for lands entered or withdrawn
- Review and approve all timber sale cutting notices/reports
- Attend all county forestry committee meetings and any county board meetings as requested
- Timber sale inspections and Timber sale administration

Despite the clear strong role of the DNR Liaison, the system to monitor Group Member conformance with certification requirements needs to be formalized and made explicit. Accordingly, the team has assigned a score that connotes marginal conformance with this criterion, and has stipulated a discretionary CAR.

CAR 2004.2: By the year 1 surveillance audit, the WCFP must expand on their current internal control system (i.e., DNR liaison responsibilities with respect to certification, internal audits, etc) to improve Group Member conformance with the certification requirements. The internal control system must include a system and provisions for DNR to identify and address Group Member non-conformances with the FSC standard.

Group.C.4 Group Stability and Continuity	<ul style="list-style-type: none"> ▪ DNR has been in successful partnership with the Counties since 1927. Counties have been enrolled in the County Forest Program since 1929. ▪ County forests are strongly subsidized by DNR and as a result stability of the group is hinged on continued funding. 	
Score: 95		

Findings: Wisconsin County Forests Program is well-established and has very high stability and continuity. There has been no turnover of the 29 Counties that participate in Wisconsin's County Forests Program, from which the FSC Group Members will be drawn. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.

IMPORTANCE WEIGHTED AGGREGATE SCORE, GROUP/ENTITY MEMBER ADMINISTRATION EVALUATION

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 criteria in this program element. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

Criterion	Relative Importance Weight	Performance Scores	Weighted Average Scores
1. Group Organizational Competency	.40	95	38
2. Reporting and Documentation	.15	85	12.75
3. Oversight and Internal Control Systems	.25	80	20
4. Group Stability and Continuity	.20	95	19
			89.75

Applying these normalized weights to the 4 assigned performance scores (presented and discussed above) leads to a single weighted average score for the program element of 90. In that this weighted average score exceeds the threshold of 80 points, overall performance with respect to this program element is judged to be exemplary and certifiable.

SECTION 1.2 DETAILED OBSERVATIONS & RESULTS

The findings and observations of the evaluation team are presented in this section, structured according to the 9 applicable FSC Principles. To follow are brief descriptions of each Principle and the team's findings and judgments, disaggregated to the Criteria within each Principle.

PRINCIPLE #1: COMPLIANCE WITH LAWS & FSC PRINCIPLES

Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

This FSC Principle is elaborated through a set of 6 Criteria that focus on issues such as conformance to all applicable national and local laws and regulations, payment of legally prescribed fees, taxes and royalties, protections against illegal harvesting and other unauthorized activities, and demonstrating a long-term commitment to adhere to the FSC Principles & Criteria.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C1.1 Forest Management shall respect all national and local laws and administrative requirements.	<ul style="list-style-type: none">▪ DNR Liaison forester helps ensure administrative requirements are met▪ Substantial formal and on-the-job training is undertaken to ensure that DNR foresters have excellent working knowledge of laws, regulations, and policies▪ Copies of laws, administrative rules, and handbooks are available via intranet; most foresters also maintain printed copies▪ Comprehensive Land Use Plans are written in the format of the statutes▪ Timber sale administration aims to ensure compliance with BMP's▪ DNR liaison reviews all or a sample of sales before closing them out.▪ Compliance with Chippewa treaty rights	<ul style="list-style-type: none">▪ Inconsistency of enforcement of BMP violations especially with respect to water quality issues
Score: 90		
Findings: Taking into account the strengths and weaknesses (in this case there was only one weakness, which is addressed elsewhere) listed above, the team has assigned a score that connotes outstanding performance with this Criterion		

C1.2 All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	<ul style="list-style-type: none">▪ PILOT payments are routinely paid and paid in a timely fashion▪ DNR carries out financial audits of Counties helping to ensure payments are made	<ul style="list-style-type: none">▪ None noted
Score: 95		
Findings: Taking into account the strengths and weaknesses (in this case there were no weaknesses) listed above, the team has assigned a score that connotes outstanding performance with this Criterion.		

C1.3 In signatory countries, the provisions of all the binding international agreements such as CITES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected.	<ul style="list-style-type: none"> ▪ Team did not observe evidence of non-compliance with relevant agreements ▪ Counties are in conformance with Treaty rights 	<ul style="list-style-type: none"> ▪ DNR/County staff do not possess a lot of knowledge about International Agreements
Score: 89		

Findings: County and DNR staff are aware of CITES, the only international agreement that is pertinent to their operations. Furthermore, Counties are honoring Treaty rights, which also should be considered under this Criterion. Based upon the team's observations, the WCFP demonstrates clear conformance with the Criterion.

C1.4 Conflicts between laws, regulations and the FSC P&C shall be evaluated for the purposes of certification on a case by case basis.	N/A	N/A
Score: —		

Findings: This Criterion was not scored by the audit team, as it is primarily an advisory Criterion of relevance after award of certification. In the judgment of the audit team, there is a very low likelihood of conflicts arising between laws/regulations and the FSC P&C.

C1.5 Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	<ul style="list-style-type: none"> ▪ A number of Counties have recreation officers. ▪ Gates and berms are used to prevent unauthorized entry ▪ Timber theft and other unauthorized activities are minimized through monitoring and aggressive prosecution ▪ Counties either have developed comprehensive access plans or will be doing so in the next planning cycle 	<ul style="list-style-type: none"> ▪ Many of the County Programs have significant problems with unauthorized ATV use
Score: 92		

Findings: Criterion 1.5 is significantly more challenging to managers of public forests because of public expectations of open access. However, Wisconsin Counties are exceptional at controlling unauthorized activities within the context of a public land manager. Actions taken by County Forests include gating and berming roads, close surveillance of timber sales for theft, combing through trash to find and prosecute perpetrators, hiring Recreation Officers. Accordingly, the team has assigned a score that connotes “superlative conformance” with this Criterion, as elaborated by the Lake States Regional Standard.

C1.6 Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	<ul style="list-style-type: none"> WI DNR State Lands are FSC certified WI DNR has clearly committed to FSC 	None noted
Score: 85		

Findings:
 This Criterion is further elaborated by one *regional indicator*, which is limited in its focus to notifying the certifier of any changes in ownership and/or management planning. Evidence of conformance included the earnestness and openness with which DNR has engaged in the certification process on the State lands. We are also quite confident that DNR has the capacity and willingness to keep SCS duly informed of any changes in the management of the County Forests, were they to be certified. Thus, the team assigned a score that connotes clear conformance with this criterion.

Importance Weighted Aggregate Score for Principle 1:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 6 Criteria in this Principle. Under SCS’ accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located:

FSC Principle #1: Compliance with Laws and FSC Principles	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
1.1	0.32	90	29.17
1.2	0.11	95	10.81
1.3	0.14	89	12.25
1.4	NA	NA	

1.5	0.15	92	13.74
1.6	0.28	85	23.89
			89.49

Applying the normalized weights of relative importance to the 5 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of **90**. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #2: TENURE AND USE RIGHTS/RESPONSIBILITIES

Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

This FSC Principle, detailed through 3 Criteria, focuses on the long-term tenure and use rights to the land that is undergoing the certification evaluation. Forest managers seeking FSC-endorsed certification must establish clear and legal ownership or right to manage the defined forest area that is being evaluated. Customary use rights, if clearly demonstrated, must be appropriately honored.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C2.1 Clear evidence of long-term tenure and forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated.	<ul style="list-style-type: none"> Leases are clearly documented, and the SCS team did not observe any major gaps relative to this indicator. Affected land boundaries are clearly identified on the ground prior to commencement of management activities. Counties display signage informing public of coming on and off County Forests 	<ul style="list-style-type: none"> County forest boundaries, outside of timber sales, are often not painted
Score: 90		
Findings: County Forests clearly have the long-term right to manage their forests. County Forests have documented the legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties, e.g. Statutes and Treaty Rights. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.		

C2.2 Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over	<ul style="list-style-type: none"> County forests offer exceptional public use opportunities for a large variety of activities We are not aware of County Forests denying legal or customary rights that are consistent with conservation and 	<ul style="list-style-type: none"> Modes and frequency of consultation with relevant tribes needs improvement- see Principle 3
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------

forest operations unless they delegate control with free and informed consent to other agencies.	<p>the management plan</p> <ul style="list-style-type: none"> Counties have made considerable efforts to try and understand and better plan for recreational uses of the forest Opportunities for public consultation are available in long term (10-year plan) and short term (committee meetings) planning 	
Score: 90		

Findings: The 2 regional indicators associated with this Criterion establish the following expectations: a) that legal and customary use rights are allowed when consistent with conservation and management planning objectives and, b) that forest managers consult with concerned groups when developing management plans and designing forest management activities. County forests excel at both of these indicators, thus a score signifying outstanding conformance is awarded

<p>C2.3</p> <p>Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<ul style="list-style-type: none"> Counties take steps to notify adjacent property owners of upcoming timber sales in an effort to agree on property lines and mitigate potential problems Monthly Forestry Committee meetings are available and utilized as a means to avoid and resolve disputes 	<ul style="list-style-type: none"> A written dispute resolution process is not made available to the public
Score: 85		

Findings: The laws of the State of Wisconsin provide clear avenues (e.g., the state courts) of recourse for citizens to air and resolve any grievances regarding tenure and use rights. With respect to informal dispute resolution, good relations with stakeholders are maintained through DNR and County staff participation in the community and the open door policy of the Forest Administrator. A systematic dispute resolution mechanism is in-place, though not formalized in writing. First, disputes resolution proceeds informally by Counties providing ample opportunities for appellant to meet and discuss with Country Forest Administrator; then formally, though monthly County Forestry Committee meetings. Accordingly, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Lake States Regional Standard.

Importance Weighted Aggregate Score for Principle 2:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 3 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #2 <i>Tenure and Use Rights and Responsibilities</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
2.1	0.54	90	48.51
2.2	0.16	90	14.74
2.3	0.30	85	25.27
			88.51

Applying the normalized weights of relative importance to the 3 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of **89**. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #3: INDIGENOUS PEOPLES' RIGHTS

The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

This FSC principle is concerned about the rights of indigenous peoples to own, use and manage their lands and territories. The Criteria focus on issues such as tenure rights of indigenous people, protection of cultural sites, and compensation for traditional knowledge.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C3.1 Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	N/A	N/A

Score: N/A		
---------------	--	--

Findings: As this evaluation does not pertain to management of tribally owned and/or controlled forestland, this Criterion is not relevant and, thus, not scored.

C3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	<ul style="list-style-type: none"> ▪ Planning process is open to all of the public- as such Tribes have had opportunity to participate ▪ Some Counties have made explicit efforts to consult with Tribes ▪ Responsibilities with respect to Treaty Rights are briefly discussed in the 10-year plan 	<ul style="list-style-type: none"> ▪ Counties are not systematically consulting with Tribes
Score: 75		

Findings:

The Lake States Regional Standard has established two *regional indicators* for this Criterion. The first indicator establishes an expectation that managers of certified forests *identify and contact* tribal groups having customary or legal use rights and to *invite their participation* in management planning. The second *regional indicator* states that managers of certified forests should *protect* tribal resources that may be affected by forest management activities. The Chippewa Treaty Rights are the most notable with respect to County Forests. As stated in the Public Forest Lands Forest Handbook, “*Indian treaty rights, and specifically Lake Superior Bands of Chippewa, were granted reserved rights to hunt, fish and gather on all ceded lands in eastern Minnesota and northwest Wisconsin as part of treaties in 1837 and 1842. Federal courts have determined that these Native Americans retain those rights to this day. In a February 21, 1991 decision, Federal Court Judge Barbara Crabb determined that the Chippewa's rights however do not include the right to harvest the commercial timber resource. When the Chippewa entered into the treaties they ceded to the United States government their rights to the pine timber forever. It was determined that commercial timber harvesting within the ceded territory was not among the Chippewa's usual and customary activities at the time the treaties were signed. Besides hunting and fishing rights, the Chippewa Indians did retain the right to gather miscellaneous forest products in the ceded territory including firewood, boughs, tree bark, lodge poles, marsh hay, and maple syrup. This type of gathering was determined to be usual and customary activities of the Chippewa at the time the treaties were signed.*”

Based upon discussions with County and DNR staff as well as tribal representatives, the SCS audit team concludes that the County Forest Program (FSC Participating Counties) are not systematically consulting with Tribes regarding protection of Tribal resources and usage rights. Accordingly, the team has assigned a score that connotes clear non-conformance with this criterion.

Major CAR 2004.2- Prior to the award of certification, the Wisconsin County Forest Program (WCFP) must identify Tribes with customary use rights or other legal use rights

to the management area. Participating counties, or the WI DNR on the counties' behalf, must invite relevant Tribes to participate in the planning process, particularly planning related to identification and protection of Tribal resources, including treaty rights and cultural and archaeological sites

Note: This Major CAR will be considered met upon the participating counties providing a complete list of relevant Tribes and, either the counties or the WI DNR, providing evidence (notes from a phone conversation and/or copy of written correspondence) of an initial solicitation inviting their participation in the planning process.

Closed February 09, 2005. On January 8, 2005, Wisconsin County Forests sent letters to 11 Tribes (as well as Great Lakes Indian Fish and Wildlife Commission GLFWC) deemed to be potentially interested in management of the County Forests. The letters provided contact information for the County Administrators, described the County Forests, the County Forest planning process, and invited participation on identifying archaeological and cultural resources. With these actions the Wisconsin County Forest Program has complied with Major CAR 2004.2.

<p>C3.3 Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p>	<ul style="list-style-type: none"> ▪ For sites that have been identified, information is securely kept in confidence ▪ Wisconsin maintains a database of known archeological sites that is widely used by State forest managers and partially used by County forest managers ▪ Road building and federally funded projects require historical database screens 	<ul style="list-style-type: none"> ▪ No systematic process is in-place for Counties to conduct archeological database searches, either through State Historical Society or other resources ▪ Field personnel have not been trained in cultural resource identification, and thus rely on existing information rather than on their own substantial field presence to help find new sites ▪ Tribes are not typically invited to participate in identification process
<p>Score: 75</p>		

Findings: In the *Lake States Regional Standard*, this Criterion is elaborated with three *regional indicators* which establish these expectations of forest managers:

- Undertake systematic efforts to identify cultural, historic and religious sites and invite tribal participation in that process
- Consult with tribal representatives as to the appropriate means for protecting identified tribal resources
- Maintain confidentiality, as appropriate, regarding tribal resources

Based upon review of procedures of DNR Handbooks and interviews conducted, it is the audit team's judgment that County Forests do not fully conform to the basic thrust of this Criterion. Many foresters that were consulted referred to archeological screens through the NHI database, however, the NHI database lacks archeological information. According to the *Timber Sale Handbook*, "New road construction requires an

archeological/historical review.” However, timber sales only require a review on DNR lands. With respect to conforming with Criterion 3.3, County Forests are expected to utilize the same archeological screening methods that were deemed necessary on State DNR lands. Timber Sale Narratives include a section for archeological screens, however, the screens are not systematically being completed. Accordingly, the team has assigned a score that connotes clear non-conformance with this criterion.

CAR 2004.1: At the year 1 surveillance audit (approximately 12 months from award of certification), participating counties, or the WI DNR on the counties’ behalf, must demonstrate how input received from Tribes was considered and utilized to improve identification and protection of Tribal resources, including treaty rights and cultural and archaeological sites.

CAR 2004.3: By the year 1 surveillance audit the Wisconsin County Forest Program must demonstrate that it is regularly utilizing the State Historical Society Database and other relevant resources to screen pending land disturbing activities for archaeological and historical sites.

<p>C3.4 Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species²...</p>	N/A	N/A
<p>Score: N/A</p>		

Findings:
Not Applicable as County Forests do not use knowledge or management techniques originating from Native Americans.

Importance Weighted Aggregate Score for Principle 3:

² Full text of C3.4: Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

FSC Principle #3 <i>Indigenous Peoples' Rights</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
3.1	NA	NA	0
3.2	0.50	75	37.5
3.3	0.50	75	37.5
3.4	NA	NA	0
			75

Applying the normalized weights to the 2 assigned performance scores, and rounding to the nearest integer, leads to a single weighted average score for this Principle of: **75**. Per SCS protocols, a Principle score below 80 results in the triggering of Major CARs that must be corrected prior to award of certification. See Major CAR 2004.2 (Section A.3.4)

PRINCIPLE #4: COMMUNITY RELATIONS & WORKERS' RIGHTS

Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.

This FSC Principle, elaborated through 5 Criteria, addresses the effects of forest management on the well being of forest workers and local communities. The Criteria focus on issues such as: preferences for local employment, compliance with employee health and safety regulations, rights of workers to organize, completion of social impact assessments, and employee grievance resolution mechanisms. In short, this principle expresses the position that exemplary forest management must include a conscious sensitivity to the interests of the most directly impacted stakeholders: employees, contractors and local communities.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	<ul style="list-style-type: none"> Counties distribute bid prospectus to a comprehensive list of potential bidders Counties intentionally vary sizes of timber sales to allow access to local companies of varying sizes 	<ul style="list-style-type: none"> Timber sale contracts do not explicitly require that employees of contractors (loggers) are protected by all state and federal labor laws regarding discrimination, wages, benefits and other conditions of

<p>Score: 95</p>	<ul style="list-style-type: none"> ▪ Though County employee salaries may be less than industry, there are other benefits that help offset the differences. ▪ There is a long average tenure of DNR and County forestry staff, indicating that the quality of work life (compensation, work hours, job security, intangibles, etc.) is favorable compared to other employment opportunities ▪ Annual expenditures on county forest access roads (which are open to all licensed, registered, and inspected motor vehicles) exceed \$293,000 ▪ Each year the County Forests offer over \$18 million in timber sales. ▪ There is an active training and continuing education program for DNR and County employees; though DNR training program is stronger 	<p>employment</p>
-----------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------

Findings: This Criterion is elaborated in the *Lake States Regional Standard* through 6 *regional indicators* that establish the following expectations:

- Employment and contracting opportunities do not discriminate against non-local workers
- Employment and contracts provide quality work opportunities
- Forest managers contribute to public education about forestry
- Forest managers participate in regional/local civic activities and invest in the local economies
- Salaries and hiring practices exceed prevailing local norms
- Forest managers assure that employees of contractors and sub-contractors are covered and protected by all applicable labor laws.

The strengths listed above provide evidence of the County Forest Program's strong performance with providing opportunities for employment and other services. Through a suite of key services such as commercial timber production, outdoor recreation and habitat maintenance, the County Forests clearly are generating important opportunities for the citizens of Wisconsin and neighboring states.

Compared to circumstances observed in other regions of North America (notably, the Maritime Region of Eastern Canada and northern Maine), woods workers (contractors and their employees) appear to be able to derive quality business opportunities on the County Forests. Interviews with contractors and their employees (see section 2.4) revealed generally positive viewpoints toward County managers and the logging opportunities available on the County Forests. The one notable exception was the challenges that small operators have in competing with larger operators- however- this is due to market forces beyond the control of County Forests and DNR. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.

<p>C4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<ul style="list-style-type: none"> ▪ Timber sale contracts explicitly reference safety requirements ▪ All logging contractors interviewed had received logger training, such as through FISTA; insurance companies require so it is universal ▪ The audit team observed logging machinery that is well maintained and operated safely ▪ Accidents for employees (not contractors) are tracked within each County 	<ul style="list-style-type: none"> ▪ Counties visited did not have active safety programs- e.g., safety meetings and or appointed safety officer
<p>Score: 85</p>		

Findings:

This Criterion is elaborated in the *Lake States Regional Standard* through 1 *regional indicator* that establishes the following expectation:

- Forest managers and contractors develop and implement safety programs and procedures

SCS audit team observed adequate safety procedures in place. DNR is an active supporter of and participant in logger training programs. The main “weakness” relative to this Criterion is the lack of a pro-active safety program, for example a safety officer is appointed in each County and safety issues are discussed on a regular basis. Overall, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Lake States Regional Standard.

C4.3 The rights of the workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	<ul style="list-style-type: none">▪ DNR employees and some County employees are unionized▪ Right to organize is guaranteed by U.S. and State of Wisconsin Law▪ A clear and graduated approach for resolving disputes with contractors is in-place	<ul style="list-style-type: none">▪ There is no evidence that DNR or Counties use culturally sensitive means of interacting with migrant workers employed in contracted activities on the County Forests, such as planting
Score: 85		

Findings: This Criterion is elaborated in the *Lake States Regional Standard* through 2 *regional indicators* that establish the following expectations:

- Forest workers (employees and contract employees) are free to associate regarding employment matters
- Forest managers and contractors develop culturally sensitive dispute resolution mechanisms

Considering the right to organize is guaranteed and that SCS confirmed an effective dispute resolution process is in place for contractors, the team awarded a score that connotes clear conformance with this Criterion.

C4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultation shall be maintained with people and groups directly affected by management operations.	<ul style="list-style-type: none">▪ There is opportunity for public consultation during the 10 year planning process and during the monthly Forestry Committee meetings▪ As key issues arise, e.g., access planning, public input is sought	<ul style="list-style-type: none">▪ Forest managers are required to actively cooperate with State Historical Societies regarding protection of archaeological and historical sites. The SCS Team concluded that improved cooperation was needed by Counties to comply with this requirement (Principle 3- CAR 2004.3)
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Score: 90		
<p>Findings: This Criterion is elaborated in the <i>Lake States Regional Standard</i> through 5 <i>regional indicators</i> that establish the following expectations:</p> <ul style="list-style-type: none"> ○ Land owners are afforded fair and reasonable opportunities to provide input into land management decisions ○ Input is sought in identifying sites of archeological, historical or cultural significance ○ Feedback is solicited from affected stakeholders; significant concerns are duly addressed ○ Managers of mid-sized and large forests provide for public input into management planning ○ Managers of public forests must develop competent and effective consultation procedures <p>As a result of the County Forest Programs open and transparent public process that includes opportunity for long-term (10-year plans) and short range tactical (monthly committee meetings) planning the County Forest Program excels at 4 of the 5 indicators. Improvement is needed in seeking input in identification of archeological, historical, and cultural sites, however this weakness is fully addressed under Criterion 3.3. As a result the team has assigned a score that connotes outstanding conformance.</p>		

C4.5 Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation ³ ...	<ul style="list-style-type: none"> ▪ An open and transparent public input and planning process helps head off disputes before they become problematic ▪ As specified in timber sale contracts and prospectus, Counties require contractors to have adequate liability insurance ▪ An effective dispute resolution process is in-place 	<ul style="list-style-type: none"> ▪ Although there is a clear dispute resolution process in place- it is not formalized in writing and made available to interested parties
Score: 85		
<p>Findings: This Criterion is elaborated in the <i>Lake States Regional Standard</i> through 2 <i>regional indicators</i> that establish the following expectations:</p> <ul style="list-style-type: none"> ○ Managers attempt to resolve disputes and grievance through open communication and negotiation prior to legal action ○ Forest managers and contractors have adequate liability insurance <p>Taking into account the strengths and weaknesses listed above, the team has assigned a score that connotes clear conformance with this Criterion</p>		

³ Full text of C4.5: Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.

Importance Weighted Aggregate Score for Principle 4:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 6 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #4 <i>Community Relations and Worker's Rights</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
4.1	0.25	95	23.79
4.2	0.25	85	21.29
4.3	0.11	85	9.34
4.4	0.22	90	19.77
4.5	0.17	85	14.42
			88.6

Applying the normalized weights to the 5 assigned performance scores, and rounding to the nearest integer, leads to a single weighted average score for this Principle of 89. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #5: BENEFITS FROM THE FOREST

Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

This FSC Principle addresses several loosely related issues such as efficiency in the use of forest products, financial viability of the forest management operation, and diversity of environmental and social benefits from forest management. Principle 5 is elaborated through 6 Criteria. Of note, Criterion 5.6 requires that the rate of harvest not exceed levels that can be permanently sustained, perhaps one of the most focused and specific requirements found throughout the P&C. The other 5 Criteria within this principle address matters such as balancing financial objectives with full cost accounting (including environmental costs), optimal use of harvested products and local processing, minimization of waste and residual stand damage, diversification of products from the forest, and protection of forest services such as watershed functions and fisheries values.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C5.1 Forest management should strive towards economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	<ul style="list-style-type: none"> ▪ Long tenure of sustainable forest management ▪ County Forest receive sizable funding from DNR ▪ There is an effective cost sharing program for ATV, snowmobile, and other recreational uses ▪ Sustainable forestry grant money is available for projects like inventory, invasive control work ▪ \$0.10 per acre money available for wildlife habitat improvement 	<ul style="list-style-type: none"> ▪ DNR Wildlife budget has been drastically reduced in recent years ▪ Demand on County and DNR staff and resources to manage recreation, which typically does not generate revenue, continues to increase and at some point could seriously detract from timber management activities.
Score: 90		

Findings:

This Criterion is elaborated in the *Lake States Regional Standard* through 3 *regional indicators* that establish the following expectations:

- Forest managers demonstrably engage in long-term rather than short-term management
- The management plan is not compromised through short-term responses to financial exigencies
- Investments are sufficient to achieve management objectives and restore forest health and productivity

The audit team found the WI County program to be strong relative to this indicator for several reasons:

- County forests have a long-track record of continued support of long-term forest management
- Harvest levels are not depletionary
- The dedicated revenue source for forestry (0.2% real estate tax) is stable and generates an assured revenue stream
- Through the County Forestry Aid Fund there are several forms of direct financial assistance available to County Forests including the Administrator Grant Program (50% funding of the salary and 50% of the fringe benefit costs of a professional forester in the position of administrator or assistant county forest administrator); Sustainable Forestry Grant Program (no match required) to be used for special, short term or unanticipated projects that promote sustainable forestry); Variable Acreage Share Loans; and Project Loans.
- County Forest Law requires forests to support long-term management in order to be eligible for key funding
- Because of the partnership with WI DNR- there are numerous additional resources (e.g., wildlife and forest health experts) readily available.

On the negative side of the ledger County Forests are facing two significant challenges. First, DNR is facing financial woes. As budgets have shrunk over the past several years, staffing levels and operating budgets have not kept pace with expanding work loads and management challenges. Second, as with most public forests in the U.S., there is more and more pressure from the public to provide recreational opportunities. Managing and mitigating the effects of many recreational opportunities are a financial burden.

Notwithstanding, the audit team concludes the economic viability of the County Forests is being maintained. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.

C5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	<ul style="list-style-type: none">▪ The audit team observed clear evidence of County Forests scaling sales to allow successful competition by small operations▪ County Forests do an excellent job building common but under	<ul style="list-style-type: none">▪ NTFPs are currently not adequately addressed in the 10 year plans, though the template for the next plan expands on NTFP management▪ Because the Counties sell nearly all of its timber to the highest bidder
--------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>Score: 90</p>	<p>utilized species into timber sales</p> <ul style="list-style-type: none"> ▪ Strong emphasis on utilization and value recovery during timber sales ▪ Counties permit non-timber forest product contracts such as sphagnum moss, boughs, tag alder, etc, which primarily benefit small businesses 	<p>through lump sum bids, they are not able to give preference to local, financially competitive facilities for value-added processing and manufacturing</p>
<p>Findings: This Criterion is elaborated in the <i>Lake States Regional Standard</i> through 3 <i>regional indicators</i> that establish the following expectations:</p> <ul style="list-style-type: none"> • Opportunities are provided for local value-added processing • Use of non-timber forest products is incorporated into the management plan • Markets are explored for commonly under-utilized forest products <p>The County Forest Program does what it can to encourage local processing under the constraints of their bidding process, e.g., varying the range in size of timber sales. County Forests for the most part can not effectively encourage local processing. However, Counties Forests do an excellent job with non-timber forest products and selling commonly under-utilized forest products. Thus, the team concludes an outstanding level of conformance with this Criterion.</p>		

<p>C5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	<ul style="list-style-type: none"> ▪ Utilization is excellent ▪ Observed hauling of residual non-merchantable material back into woods ▪ Mechanized logging equipment designed to ensure excellent utilization is commonly, and increasingly, employed ▪ Observed excellent utilization with the exception of occasional high stumps ▪ Audit team observed very little residual stand damage across the diversity of forest types and prescriptions. 	<ul style="list-style-type: none"> ▪ A number of timber sales had stumps higher than specification ▪ No provisions to define acceptable levels of residual damage ▪ Rutting and compaction commonly noticed ▪ No definitions of acceptable levels of rutting or compaction
<p>Score: 85</p>		

Findings: This Criterion is elaborated in the *Lake States Regional Standard* through 3 *regional indicators* that establish the following expectations:

- In the process of removing commercial products, woody debris is left on the forest floor to maintain ecosystem functions
- Loss/waste of merchantable forest products is minimized
- Harvest practices minimize residual stand damage

County Forest Program generally does an excellent job at maximizing utilization and minimizing residual stand damage. Increased efforts to formalize policies on coarse woody debris retention, residual stand damage, and rutting/compaction and ensuring their implementation would strengthen performance with this Criterion. Accordingly, the team has assigned a score that connotes clear conformance with this criterion.

Recommendation 2004.2- Counties should consider recruiting aspen for downed woody debris in full range of forest types (few large aspen were retained on sites).

<p>C5.4 Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<ul style="list-style-type: none"> ▪ All forests visited sold a broad range of products including veneer, sawtimber, pulpwood, non timber forest products ▪ Recreation opportunities on the County Forests are exceptional ▪ Counties are taking on the bulk of ATV use. ▪ Other products sold by counties include firewood and balsam fir boughs. 	<p>None noted</p>
<p>Score: 95</p>		

Findings: Taking into account the strengths and weaknesses (in this case there were no weaknesses) listed above, the team has assigned a score that connotes outstanding performance with this Criterion.

<p>C5.5 Forest management operations shall recognize, maintain and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	<ul style="list-style-type: none"> ▪ BMP's are routinely implemented and are typically done well ▪ All loggers interviewed had undergone FISTA and BMP training ▪ Stream crossings were done well without exception 	<ul style="list-style-type: none"> ▪ Sale unit boundaries on wetland areas such as marshes and vernal pools not always clear
<p>Score: 90</p>		

Findings: The County Forests practice sound adherence to BMPs for water quality. With one noticeable exception, SMZs were well done and usually consisted of unmanaged buffers, even where the opportunity exists to practice selection thinnings. Crossings of intermittent or permanent streams were either avoided or done conscientiously according to accepted standards. The team found no instances of machinery operations in waterways. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.

<p>C5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<ul style="list-style-type: none"> 85% percent of net growth is harvested based on FIA data Counties use a crude but functional regulation system driven by area control Recon data for field reviewed stands is re-calibrated each year 	<ul style="list-style-type: none"> Recon data is very old and acknowledged to often be incorrect Data is lumped by cover type- no grade information or species-specific data is available There is high variability in the currency of recon data across counties Less than 10% of recon data is updated annually
<p>Score: 80</p>		

Findings: The County Forests are clearly not pushing their harvest activities to biological limits. Rotation ages are either at the standard for the region or, in many cases, exceed commonly accepted ages. Residual basal areas in thinnings are conservative and well within recognized guidelines.

Given the rotation ages in the Silviculture Handbook, area control provides a conservative basis for determining annual harvests. The annual harvest acreages derived from Recon are further reduced after staff review of stand condition or special features (e.g., natural areas).

One of the drawbacks to the use of Recon is its predominantly old data. Field staff do revise annual planning acreages based on field review. However, if Recon differed dramatically from reality, it would affect total cover type acreages thus affecting the acreage planned for annual harvest. If Recon overestimated the total cover type acreage, the annual harvest would be overestimated. Given the age of most of the cover types on the County Forests, even this would not be biologically inappropriate. If Recon underestimated, this could be problematic for mature cover types such as aspen. All of which argues for updating Recon as quickly as possible.

Since planning is done using area control, an inventory system monitoring growth and volume is not necessary (although it would be desirable for other reasons). Recon functions adequately for annual harvest planning. Accordingly, the team has assigned a score that connotes marginal conformance with this criterion.

Importance Weighted Aggregate Score for Principle 5:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 6 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #5 <i>Benefits from the Forest</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
5.1	0.21	90	87.19
5.2	0.11	90	
5.3	0.07	85	
5.4	0.11	95	
5.5	0.20	80	
5.6	0.30	80	

Applying the normalized weights of relative importance to the 6 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of **87**. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #6: ENVIRONMENTAL IMPACT

Forest Management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest

This FSC Principle is elaborated by a set of 10 Criteria that focus on issues such as impact assessments, protection of listed species, biodiversity, reserve areas, streamside and wetlands buffers, erosion control, exotic species, chemical use, high conservation value forests, and forest conversions. Of all the FSC Principles, this one is the most expansive in scope, with an associated high level of emphasis on data and information collection and analysis. Collectively, the thrust of this principle encourages the maintenance and restoration of natural forest conditions.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C6.1 Assessment of environmental impacts shall be	■ The 2460 timber sale form includes a narrative section that briefly discusses environmental	■ There is little evidence of cumulative effects assessments-other than discussion of dwindling

completed appropriate to the scale, intensity of forest management ⁴ ...	<p>impacts</p> <ul style="list-style-type: none"> ▪ BMP's and water regulations being applied throughout County system ▪ NHI database systematically screened prior to timber sales ▪ Silvicultural handbook, ecological landscapes, and other DNR resources are used to assess impacts of various harvest regimes ▪ Kotar habitat classification system is widely used ▪ Counties consult with species experts (raptor, Karner Blue specialists) and DNR biologist 	<p>types</p> <ul style="list-style-type: none"> ▪ No project level EA's (other than section of timber sale narrative) are conducted
Score: 82	<p>Findings: Criterion 6.1 is elaborated by 4 regional indicators covering</p> <ul style="list-style-type: none"> ▪ An assessment of current ecological conditions that covers 6 specified subjects (i.e., disturbance regimes and successional pathways, T&E species, common flora and fauna and habitat, soil resources, water resources,) ▪ A comparison of current ecological conditions with historical conditions ▪ An assessment of short-term potential impacts and cumulative effects prior to commencement of a field project ▪ Development and implementation of options for maintaining or restoring ecological functions <p>Evidence of conformance includes environmental assessments being conducted as part of the 10 year planning process. In addition, limited environmental assessment does occur at the individual harvest stage, such as screens for threatened and endangered species. The County environmental impact assessment process (supplemented by DNR resources) meets the breadth of the indicators listed above. Because some are met rather informally, the standing relative to these indicators can be improved by ensuring that the new template for Environmental Assessments covers these items. Accordingly, the team has assigned a score that connotes marginal conformance with this criterion.</p> <p>Recommendation 2004.3- Ensure template for new EA fully covers all the indicators in Criterion 6.1 of the Lake States Standard</p>	

⁴ Full text of C6.1: Assessment of environmental impacts shall be completed - appropriate to the scale, intensity of forest management and the uniqueness of the affected resources - and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site disturbing operations.

<p>C6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats⁵...</p>	<ul style="list-style-type: none"> ▪ When a state and/or Federally listed as threatened, endangered, of special concern, or sensitive species is determined to be present, its location is reported to the manager of the species' database ▪ All County Forests (seeking FSC) with Karner Blue Butterfly habitat or potential habitat have been important contributors to the HCP and other efforts to benefit this species ▪ DNR has provided forest raptor training to liaisons ▪ County foresters cooperate in Wolf recovery projects ▪ The NHI database is actively utilized on all County Forests; locations of endangered species are kept confidential ▪ DNR has various respected species specialists on staff (e.g., wolf, eagle/osprey) 	<ul style="list-style-type: none"> ▪ There is an opportunity for additional training of County Forest staff on identification of TES species and proper safeguards; as well as enhanced use of DNR biologists ▪ On the ground surveys for occurrence of TES species or habitat not systematically done across County Forests
<p>Score: 85</p>		

⁵ Full text of C6.2: Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping and collecting shall be controlled.

Findings: There are five regional indicators associated with this Criterion that the audit team considered. Collectively, these indicators speak to the ability of the forest manager to protect rare, threatened and endangered species and their habitats. Clearly, the County Forest Program has taken the necessary actions for the protection and management of these species. The NHI database, though the extent of its inventory varies by county, is a valuable resource that is systematically used by forest managers. Counties work closely with specialists to coordinate management activities when there are NHI hits. Substantial time and resources have been placed on protecting and managing rare, threatened and endangered species as significant resources of the County Forests (e.g., Karner Blue Butterfly, Wolves). Counties lack the biotic inventories that have been conducted on some State forests. To compensate for the lack of biotic inventories, Counties should enhance the training of County Forest staff on identification of TES species and their habitats, and proper safeguard measures. Accordingly, the team has assigned a score that connotes clear conformance with this criterion.

Recommendation 2004.4: Counties should enhance the training of County Forest staff on identification of TES flora and fauna and their habitats, and safeguard measures.

<p>C6.3 Ecological functions and values shall be maintained intact, enhanced, or restored, including:</p> <ul style="list-style-type: none"> a. Forest regeneration and succession. b. Genetic, species and ecosystem diversity. c. Natural cycles that affect the productivity of the forest ecosystem 	<ul style="list-style-type: none"> ▪ Vegetative habitat typing is widely used ▪ County forests predominantly utilize natural regeneration ▪ With the exception of one forester (CAR 2004.4), selection harvests are aimed at stand improvement ▪ Counties, to varying degrees, are working at maintaining difficult to regenerate and uncommon spp. ▪ 2005-2015 Plan includes sections on difficult to regenerate and uncommon spp. ▪ Longer rotations were found to be in use on all County Forests ▪ DNR has formed an old growth team that County Forests can utilize 	<ul style="list-style-type: none"> ▪ Habitat type is not consistently utilized across counties ▪ Most planning is done at the stand level with no structured consideration of the broader landscape ▪ More training needed in landscape-level planning and implementing prescriptions in the Silvicultural Handbook ▪ The team occasionally found County Forest and WDNR Personnel unfamiliar with specific silvicultural techniques in the Silvicultural Handbook ▪ Deer numbers are high throughout the State. ▪ Counties have very few deer exclosures or formal deer browse monitoring programs, and as such, lack important information on browsing effects on tree regeneration and herbaceous species ▪ Generally, there is inadequate attention paid to enhancing/improving habitat connectivity, particularly at the compartment level—the RECON model is not an effective means of addressing this issue
<p>Score: 82 Average of a. 85 b. 82 c. 80</p>		

		<ul style="list-style-type: none"> ▪ The Silvicultural Handbook provides guidance of 2-4 snags per acre to be retained across the landscape. Counties cannot clearly demonstrate whether this goal is being met. Typically, County Forests were not leaving declining trees or recruiting snag trees. Only a few instances were observed where counties were marking snag and den trees for protection ▪ Inadequate attention to and planning for large wood debris, although opportunities within second-growth forests are limited ▪ Lacking, in many instances, was a general sense of what proportion and configuration of retention would be left by natural disturbance regimes. The Silvicultural and Aesthetics Handbook also does not relate natural disturbance regimes to management prescriptions to retention.
--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Findings: The regional indicators associated with this Criterion relate to the ability of the forest manager to maintain, enhance or restore ecological functions on the land base. Vegetative habitat types are usually referenced in Form 2460. However, the information they can contribute to management planning (e.g., successional pathways, natural regeneration opportunities) does not seem to be consistently utilized.

In the majority of cases, annual management planning is done at the stand level within the stands produced by Recon with little consideration of the broader ecological context in which these stands exist. Current management does produce age class diversity over the landscape, although it is debatable how much of this is planned and how much is simply a result of Recon output. Across the County Forests, there was very little consistent discussion of how desired future forest composition would be affected by current management (e.g., over the next 50 years, we want to increase X covertime by X% over Y cover type).

Natural disturbance regimes in many areas of the State produced disturbances larger than those typically produced through management today. Large-scale forest disturbances are minimized on County lands and there is the potential to develop a patchwork of small-scale disturbances. No discussion of this change was witnessed by team members. (See Criterion 7.3 CAR 2004.8)

Silvicultural practices typically produced regeneration sufficient to move the forest toward the desired future condition. Concerns were raised by County Forest staff and team members that summer harvest of aspen stands to be naturally regenerated could be

problematic. These stands are harvested in summer, in part, to provide year-round employment opportunities for contractors. County Foresters commonly expressed concern that this may not always provide for sufficient regeneration and team members viewed instances where regeneration was less than successful. The County Forests do not have stocking level targets for determining the adequacy of regeneration, nor is there a standard protocol for reviewing these stands on a timeline to judge success/failure. (See Criterion 8.2, CAR 2004.8)

Typically, species such as hemlock are maintained on the landscape, even within harvest units. Within the second-growth nature of the County Forest, opportunities to work with difficult to regenerate species are limited. The team did view a successful tamarack regeneration treatment.

Retention was found in virtually every clearcut the team visited. However, in most cases, there was no clear guidance on how much, on what type of structure, or why it should be retained.

Coarse woody debris was left on harvest areas incidental to management activities. No guidance was available as to the type or size of material that should be retained. The team witnessed many instances of rutting/compaction over the County Forests. No County utilized criteria for determining what level of rutting was acceptable. County Forests do an exceptional job of utilizing BMPs for water quality. Areas that do not fall under these guides, such as vernal pools and wetlands, were found to be less effectively protected.

CAR 2004.4 is stipulated because of a severe non-conformance observed with respect to hardwood silviculture on one County forest.

Overall, the team has assigned a score that connotes marginal conformance with this criterion.

CAR 2004.4: By the year 1 surveillance audit, the WCFP must take necessary measures to ensure that DNR retains and fully uses its ability to execute authority over sale approval. Specifically, any significant deviations from the Silvicultural Handbook with respect to how northern hardwoods are managed needs to be identified and corrected.

Recommendation 2004.5: County Forests should develop and implement quantitative guidelines for stand level retention (covering green trees, snags, downed woody debris) to ensure more consistent implementation.

Recommendation 2004.6: County Forests with high deer densities should set up exclosures to measure deer impacts on tree and herbaceous species.

<p>C6.4 Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<ul style="list-style-type: none"> ▪ Notable work identifying and protecting Karner Blue Butterfly habitat with protection and enhancement of jack pine and pine barren types ▪ BER actively conducts analyses of the adequacy of the current network of reserve areas in Wisconsin ▪ SNAs are found in 70 of Wisconsin's 72 counties (though mostly on State Forests) and range in size from less than one acre to more than 7,700 acres 	<ul style="list-style-type: none"> ▪ Extensive biotic inventories, as done on many State forests, has only occurred on one County Forest (Chippewa – not included in 2004 sample pool) ▪ County Forest Program (FSC enrolled members) have not completed process with BER to assess needs and opportunities for Counties to contribute to the regions representative samples of existing ecosystems
<p>Score: 80</p>		

Findings: There are four regional indicators associated with this Criterion that the audit team considered. Generally, these indicators relate to the identification and protection of unique and representative ecosystems within the manager's landbase. With respect to representative ecosystems peer reviewer- John Kotar- suggested the County system as a whole might best address representative samples by attempting "to maintain a full range of successional stages on all forest habitat types"

There is a wide variability among Counties in the level and efforts to identify and protect unique and representative ecosystems. Because the County Forest system originated from a highly degraded landscape, opportunities for representative samples are limited.

Overall, the Team deemed the County Forest Program marginally in conformance (with a CAR to assure follow through with current plans) with this Criterion because

1. All Counties sampled were aware of and had identified some level of representative samples
2. Roughly two thirds of Counties have had some interaction with the Bureau of Endangered Resources (BER) in identifying, researching, or establishing representative samples
3. BER has developed a gap document to identify needs and opportunities for representative samples on County Forests, furthermore, a process is underway for each County (or ecoregional groupings of Counties) to meet with BER to complete assessment- Note continued certification is contingent on completion of this process (CAR 2004.5)
4. The template for the 2005-2015 Plan includes the following sections that once complete ensure that Counties will have addressed representative samples:
530 Exceptional Resources- Covering State Natural Areas and other high conservation value areas
850.3 Old growth-Covering old growth bench mark stands and opportunities for extended rotations forests
830.5 Legally Protected Plant Species
830.6 Other Plant Species and Natural Communities of Concern-NHI

Accordingly, the team has assigned a score that connotes marginal conformance with this criterion.

CAR 2004.5: By the year 2 surveillance audit, WCFP must complete the following two phases to ensure full conformance to Criterion 6.4:

Phase 1: WCFP must work with WI DNR Bureau of Endangered Resources to complete the assessment for gaps in representative samples of existing ecosystems within the landscape that are best filled on county forests.

Note: Endangered Resources has an approach for summarizing representative sample needs and opportunities by county using the Ecological Landscapes Handbook, Regional Ecological Assessments, Community Restoration & Old Growth, Wisconsin Land Legacy Study, and Nature Conservancy's Great Lakes Ecoregional Plan.

Phase 2: WCFP must initiate the process to formally recognize (this does not prohibit active management) any representative samples identified in Phase 1 that are unique to county forests and/or clearly best suited for SNA or some other form of special management designation on county forests.

<p>C6.5 Written guidelines shall be prepared and implemented to: control erosion; minimise forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.</p>	<ul style="list-style-type: none"> ▪ Contracts have wet weather operation clause ▪ Seasonal restrictions are built into timber sales ▪ State of WI monitors BMP compliance ▪ County Foresters have the right to shut down operations because of weather- though this right is executed to varying degrees; ▪ Foresters have the right to impose penalties- though use of this right is quite limited ▪ Roads on County Forests are very well maintained ▪ Some County Forests have developed comprehensive Forest Access plans- remaining Counties will complete access plans as part of 2005 planning process 	<ul style="list-style-type: none"> ▪ Major non forested wetlands are identified. Smaller wetlands (e.g., vernal pools and other small wetlands) are identified on most stands but not systematically marked on the ground. Nor is their protection guaranteed. ▪ Harvesting machinery is usually matched to site conditions to minimize site damage. ▪ Specifications or guidelines for assessing damage were not available
<p>Score: 85</p>		

Findings: The indicators relate to the minimization of environmental impacts during management activities. The DNR has developed an excellent BMP handbook which includes a wide range of protection provisions. Training in BMP's has been provided to all field employees and many private contractors

The Counties have not developed damage standards and thus have no consistent method for determining the effectiveness of their protection activities. This is left to the judgment of individual foresters and there is the potential for variation across foresters. In team discussions with field staff, the use of fines or penalties was found to be quite limited. While this can in part be attributed to their diligence in working to prevent damage, the lack of consistent standards raises concerns over implementation. In many Counties, the forestry staff cannot actively exclude contractors who have done poor quality work in the past. Award of a harvest unit is generally dictated by bid price. This reinforces the need for established damage standards. The team has assigned a score that connotes clear conformance with this criterion, however CAR 2004.6 is stipulated to address lack of clear criteria.

CAR 2004.6: By the year 1 surveillance audit, the WCFP must establish clear written criteria for acceptable levels of rutting, compaction, and residual damage; and these criteria must be implemented in the timber sale administration process.

Note: The standard for acceptable levels can (and perhaps needs to in some cases) vary according to groups of soils and by County.

<p>C6.6 Management systems shall promote the development and adoption of environmentally-friendly non-chemical methods of pest management⁶....</p>	<ul style="list-style-type: none"> ▪ Pesticides are used sparingly or not at all on the County Forests ▪ If used, it was for release of desired species or for the control of exotics ▪ Storage systems were adequate ▪ The Counties have access to WDNR 	<ul style="list-style-type: none"> ▪ Counties do not develop written prescriptions for pesticide applications
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------

⁶ Full text of C6.6: Management systems shall promote the development and adoption of environmentally-friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organisation Type 1A and 1B chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimise health and environmental risks.

<p>Score: 90</p>	<p>Forest Health Specialists for pest situations. Use of satellite imagery- to monitor pest outbreaks.</p> <ul style="list-style-type: none"> Counties typically rely on maintaining healthy forests to minimize the effects of pests and reduce the need for pesticides When chemicals are used County Forests generally use the most benign chemicals that are effective, e.g., Accord, Round-up, garlon. County Forests are not dependent on chemicals for their silvicultural activities. 	
<p>Findings: There are five regional indicators associated with this Criterion that the audit team considered. The indicators focus on the use of an integrated pest management system to reduce the use of chemical pesticides. The audit team is convinced that the County Forest Program has implemented a wide- ranging integrated pest management approach and clearly limits its use of chemicals in the field. The majority of the Counties visited simply do not use herbicides. Other Counties use them only sparingly in efforts to control invasive exotics to release a limited amount of plantings.</p> <p>The team has assigned a score that connotes outstanding conformance with this criterion, however CAR 2004.7 is stipulated to address the need for written prescriptions.</p> <p>CAR 2004.7: By the year 1 surveillance audit a written prescription must accompany all herbicide and pesticide applications.</p> <p>Recommendation 2004.7. County Forests should develop and implement clear guidelines standards for protection of water resources not covered under BMPs (e.g., vernal pool and wetland protection)</p>		

<p>C6.7 Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p>	<ul style="list-style-type: none">▪ Logging equipment operators are trained to quickly contain hydraulic fluid leaks/spills▪ Timber sale contracts include provisions for proper off-site disposal of fluids such as motor oil and hydraulic fluid▪ No leaking logging equipment was observed in the field	<ul style="list-style-type: none">▪ Logging contractors interviewed did not have spill kits with them on-site
<p>Score: 85</p>		
<p>Findings: There are four regional indicators associated with this Criterion that the audit team considered. The audit team found no evidence of improper disposal of chemicals, lubricants on any of the many sites visited. All contracts include provisions for disposal of fluids, however, no contractors carried spill kits. Accordingly, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Lake States Regional Standard.</p>		

<p>C6.8 Use of biological control agents shall be documented, minimised, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p>	<ul style="list-style-type: none"> ▪ Bt, gypcheck, and purple loose strife beetle are the main biological control agents used on County Forests, these agents are long established methods based on peer-reviewed scientific evidence ▪ DNR is experimenting with bio control for garlic mustard and Purple Loose Strife. ▪ County Forests prohibit use of GMOs 	<ul style="list-style-type: none"> ▪ None noted
<p>Score: 95</p>		

Findings: There is one regional indicator associated with this Criterion that the audit team considered. The indicator focuses on the use of biological agents in a pest management program. County Forests do not use GMO's. The County Forest Program, through collaboration with Forest Health, is a leader in efforts to use proven biological control agents to counter invasive species. Accordingly, the team has assigned a score that connotes "superlative conformance" with this Criterion, as elaborated by the Lake States Regional Standard.

<p>C6.9 The use of exotic species shall be controlled and actively monitored to avoid adverse ecological impacts.</p>	<ul style="list-style-type: none"> ▪ There is a Departmental policy to not plant exotic species, including on plantation sites ▪ Some Counties, e.g., Clark, have exceptional programs in place for controlling invasive exotic species. 	<ul style="list-style-type: none"> ▪ Programs for controlling invasive exotics are informal in some counties ▪ Some counties where invasive exotics are not yet an issue, should develop early detection programs ▪ More education in identification of invasive exotic plants is needed (CAR 2004.8)
<p>Score: 85</p>		

Findings: There are four regional indicators associated with this Criterion that the audit team considered. County Forests are clearly aware of the problems associated with exotic species introduction and has a policy not to intentionally introduce exotics. County programs to control invasives are variable across the program. Funding from DNR sustainable forestry grants is available to Counties for more control work. Accordingly, the team has assigned a score that connotes "clear conformance" with this Criterion, as elaborated by the Lake States Regional Standard.

Recommendation 2004.8 County Forests should develop more pro-active programs for controlling invasive exotics

Recommendation 2004.9 County Forests with pristine lakes should consider "walk in access only" to limit introduction of invasive exotic species.

C6.10 Forest conversion to plantations or non-forest land uses shall not occur ⁷	<ul style="list-style-type: none"> Forest conversion to plantations or non-forest land uses does not occur. 	No weaknesses noted
Score: 95		
Findings: There is a clear process in place to either discourage Counties from selling off lands, or if lands are for sale that there is a full EA review. Withdrawal requires cost benefit analysis, environmental assessment, public input, etc. Accordingly, the team has assigned a score that connotes outstanding conformance with this criterion.		

Importance Weighted Aggregate Score for Principle 6:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 10 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #6 <i>Environmental Impact</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
6.1	0.15	82	86.14
6.2	0.11	85	
6.3	0.18	82	
6.4	0.10	80	
6.5	0.07	85	
6.6	0.09	90	
6.7	0.04	85	
6.8	0.05	95	
6.9	0.06	85	
6.10	0.16	95	

⁷ Full text of C6.10: Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:

- entails a very limited portion of the forest management unit; and
- does not occur on high conservation value forest areas; and
- will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit.

Applying the normalized weights of relative importance to the 10 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of **86**. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #7: MANAGEMENT PLAN

A management plan-appropriate to the scale and intensity of the operations-shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.

This Principle is elaborated through 4 Criteria, which collectively call for a very high level of commitment to management planning.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C7.1 The management plan and supporting documents shall provide ⁸ ... Score: 85	<ul style="list-style-type: none"> ▪ Silvicultural prescriptions use the Habitat Classification System and the National Hierarchy of Ecological Units ▪ County Forest harvests are calculated using area based regulation. Yield, stocking, and regeneration data are considered ▪ Most Counties have a functional GIS ▪ Types and times of logging equipment are often specified to minimize damage ▪ Though current plans do not adequately cover landscape-level considerations, the template for 	<ul style="list-style-type: none"> ▪ There is an opportunity to better utilize the extensive body of handbooks and other planning documents available from DNR ▪ Current plans do not adequately cover landscape-level considerations

⁸ Full text of C7.1: The management plan and supporting documents shall provide:

- a) Management objectives.
- b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.
- c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.
- d) Rationale for rate of annual harvest and species selection.
- e) Provisions for monitoring of forest growth and dynamics.
- f) Environmental safeguards based on environmental assessments.
- g) Plans for the identification and protection of rare, threatened and endangered species.
- h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.
- i) Description and justification of harvesting techniques and equipment to be used

	the next round of plans does include a section for Landscape Management that would likely meet the indicator	
--	--------------------------------------------------------------------------------------------------------------	--

Findings: The indicators, elaborating this Criterion, focus on the components of an effective management plan at both the Forest and project level. “Management plan” is interpreted loosely to include all of the supporting documents (e.g., *Silvicultural Handbook*, *Timber Sale Handbook*, *Public Forest Lands Handbook*, *Ecological Landscapes Handbook*, etc) used to guide management on the County Forests. The current Comprehensive Plans (1996-2005) do not fully cover all of the planning requirements listed under 7.1. However, when one considers the supporting documents as well as the expanded scope of the 2005-1015 Plans, there is near complete coverage of the planning requirements. Performance with respect to 7.1.e.1. “*The management plan includes a description of procedures to monitor the forest*” there is a gap that is addressed by CAR 2004.9. Additionally, more attention is needed to landscape-level planning. Accordingly, the team has assigned a score that connotes clear conformance with this Criterion.

<p>C7.2</p> <p>The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic considerations.</p>	<ul style="list-style-type: none"> Plans are revised every 10-years; when compared to the schedule of the State Master Plans- this is very notable. 	<ul style="list-style-type: none"> Plan revisions do not have a formal process to incorporate new data from DNR or County monitoring efforts 10-year plans could be better adapted to the local context, in other words many plans largely consisted of boiler plate language with no local modification
<p>Score: 85</p>		

Findings: The sole indicator for this criterion requires “*The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances is one regional indicator associated with this Criterion that the audit team considered.*” With respect to the act of periodically revising the plan, the County Forest Program, is exemplary. The County Program is on the 5th cycle of comprehensive 10-year plans, and most 10-year plan targets are met. With each cycle the planning process has improved, improvements include increased stakeholder comment opportunities, access plans, environmental assessments. In addition to the 10-year plan revision process, plans are active documents and amended periodically as needed. Harvest plans and other operational components of the management plan are continuously being written and templates are revised as needed. A higher score would be awarded if Counties had a more formal method of incorporating monitoring information into plan revisions. Accordingly, the team has assigned a score that connotes clear conformance with this criterion.

<p>C7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.</p>	<ul style="list-style-type: none"> ▪ Numerous training opportunities are available to DNR liaisons and specialists ▪ DNR and County field personnel demonstrate a high level of competence and currency of knowledge about most topics of forest management ▪ DNR and County personnel participate in logger training programs 	<ul style="list-style-type: none"> ▪ Training of forestry staff in landscape level planning, multi-age hardwood management, invasive exotic plants, rare/unique plant communities, and cultural resources needs to be enhanced in order to carry out management that meets the full spectrum of the FSC standard, as well as to successfully carry out the 2005 10-year plan. ▪ Some loggers/contractors did not receive sufficient training/supervision to ensure adequate protection of soils (skidding damage, lack of water barring, too many skid trails) and snag, den, and cavity trees. ▪ County Forest Program could benefit from a formal system for tracking training (records), reviewing training, and identifying training needs and opportunities
<p>Score: 80</p>		

Findings: There are two regional indicators associated with this Criterion that the audit team considered. The indicators focus on the knowledge and training of field personnel and workers in implementing the management plan. The audit team was impressed with the general forestry knowledge level of County and DNR field personnel whose job it is to properly implement the management plan. Several areas were identified where improved training is needed- see CAR 2004.8. These gaps in knowledge will be even more important once Counties are operating under the next 10-year plan. The team has assigned a score that connotes marginal conformance with this criterion.

CAR 2004.8: By the year 2 surveillance audit, the WCFP must expand training programs to include landscape level planning, identification and control of invasive exotic plants, identification and protection of rare/unique plant communities, and identification and protection of cultural resources. Note: “training” does not require formal classes/workshops in every instance; in many cases improving content and distribution of written training material may suffice.

<p>C7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p>	<ul style="list-style-type: none"> ▪ Counties have provided public access to their management plan, additionally, all DNR handbooks and documents are available from the DNR website ▪ The DNR, as well as some Counties, maintain user friendly websites providing forestry information that is easily accessible ▪ Monthly forestry committee meetings are open to the public 	<ul style="list-style-type: none"> ▪ County Forest information dealing with topics covered under Criterion 7.1. are housed in many different documents and databases; information with respect to 7.1 is not concisely summarized on a website.
<p>Score: 85</p>		

Findings: All Counties do a sufficient job making information available to the public. Some of the Counties truly excel with elaborate websites where complete planning information is made available. Accordingly, the team has assigned a score that connotes clear conformance with this criterion.

Importance Weighted Aggregate Score for Principle 7:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 Criteria in this Principle. Under SCS’ accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #7 Management Plan	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
---------------------------------------------	-------------------------------------------	-----------------------	---------------------------

7.1	0.44	85	83.58
7.2	0.17	85	
7.3	0.28	80	
7.4	0.11	85	

Applying the normalized weights of relative importance to the 4 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of **84**. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #8: MONITORING AND ASSESSMENT

Monitoring shall be conducted-appropriate to the scale and intensity of forest management-to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.

As a conceptual and thematic companion to Principle 7, this Principle (elaborated through 5 Criteria) requires certified operations to engage in an aggressive and formal program of periodic monitoring of the impacts of management operations, focusing upon both bio-physical and socio-economic impacts as well as the extent of plan compliance.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations ⁹ ... Score: 78	<ul style="list-style-type: none"> ▪ Recon is the core of the monitoring activities on County Forests and the frequency of data collection under Recon follows a schedule not to exceed 20 years ▪ Some Counties expressed an interest in developing their own CFI ▪ Some Counties have undertaken or plan to complete a full re-inventory ▪ Some management goals and objectives are monitored through County Forest Recon, pre-harvest inventory systems, timber sale close 	<ul style="list-style-type: none"> ▪ No comprehensive plan for monitoring and detailing of effect of management on the forest ▪ Many Counties are using out-of-date RECON data ▪ County Forests involvement and adoption of management directions from research has been inconsistent

⁹ Full text of C8.1: The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.

	out inspections, as well as various ecological monitoring conducted by WI DNR.	
<p>Findings: Considering the large size and complex nature of the County Forests management, the audit team found the frequency and intensity of monitoring below FSC standards. A key clause in Criterion 8.1 is “monitoring should be consistent and replicable over time to allow comparison of results and assessment of change”. Typically this Criterion is met with a CFI system, however this is not required, as there are other ways to develop consistent and replicable monitoring. The monitoring systems currently in place do not allow for replication over time and are only very crudely useful for assessing change in forest components or characteristics. Within a given County Forest, the FIA sample data is not statistically valid and cannot be used to track change over time within that Forest. WDNR staff proposed that FIA is statistically valid for the County Forest system as a whole. While this may be the case, this provides little data of substance or use in the management of any given Forest. Accordingly, the team has assigned a score that connotes marginal non-conformance with this criterion.</p> <p>CAR 2004.9: By the year 1 surveillance audit, the WCFP must develop the framework for and begin implementing a program for consistent and replicable monitoring of changes in forest conditions, over time. Note, SCS understands that development and full implementation of the comprehensive monitoring program may take longer than 1 year and as a result SCS does not expect it to be complete at this time. As part of this monitoring program, the 10-year plan revision must include a section that discusses changes in forest condition since the last 10-year plan.</p>		

C8.2 Forest management should include the research and data ¹⁰ ...	<ul style="list-style-type: none"> ▪ FIA system (1 plot per 3000 acres- 700 plots on county forests) is statistically relevant for County Forest Program as a whole ▪ Deer counts, raptor surveys, Karner Blue surveys, wolf and other wildlife surveys/monitoring are conducted on County Forests by WDNR staff ▪ Counties are active participants in 	<ul style="list-style-type: none"> ▪ Unexpected effects of management activities (e.g., changes in growth rates, species composition, stem quality, etc), are only loosely, if at all, monitored ▪ Aggregation to cover type results in loss of key management information such as species composition. ▪ There is no systematic regeneration monitoring (except on planted
Score: 82		

¹⁰ Full Text of C8.2: Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:

- Yield of all forest products harvested;
- Growth rates, regeneration and condition of the forest;
- Composition and observed changes in the flora and fauna;
- Environmental and social impacts of harvesting and other operations;
- Costs, productivity, and efficiency of forest management

	<p>Wolf monitoring</p> <ul style="list-style-type: none"> ▪ Level of GIS sophistication varied between counties. Where GIS was more evolved it is being used as a monitoring tool to track age class distribution, acres per cover type, acres planted, recreation activities (miles of trails) 	<p>stands)</p> <ul style="list-style-type: none"> ▪ Information on major habitat elements may be pulled from Recon/Raven but we are not aware of County Forests actively using this information
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Findings: There are five regional indicators associated with this Criterion that the audit team considered. The indicators focus on the use of research and data collection methods to monitor forest management activities. At issue under this Criterion is whether an individual Forest has the data necessary to monitor change over time and to adjust its management accordingly. An unfortunate aspect of recon, is that the data is aggregated to the covertime or stand. Tree (e.g., grade, vigor) and species level (e.g., composition, growth rates) information is not recorded in a manner replicable over time. Monitoring change over time at the tree or species level, at anything other than the rudimentary level, is impossible. For example, standing timber volumes are reported by stand (i.e., covertime). While Stand X (typed as northern hardwood) may contain 1000 cords of wood, the species composition of that 1000 cords is unknown. It is possible to perform sound management with this quality of data, but all that can be said for assessing change over time is how the northern hardwood covertime performed as a whole; significant species could have been unknowingly lost from the composition. In addition to its lack of replicability, this is the fundamental problem in using recon as a “monitoring” tool.

Growth rates can only be accurately captured from a system such as FIA. Given that FIA is not statistically valid for a given Forest, the only other method available is to compare gross volumes by covertime using recon. This would be a method with very wide statistical variation due to the non-permanent nature of the recon sample points. In sum, there is no statistically sound method to track changes in growth or volumes on a given Forest.

Regeneration levels are classified into several categories within recon and these can be used for monitoring purposes. However, these categories are broad and do not necessarily reflect species differences in judging regeneration success.

Detailed records are kept on the costs and revenues of management. Every County stressed economic efficiency in evaluating management strategies. Accordingly, the team has assigned a score that connotes marginal conformance with this criterion.

Recommendation 2004.10: Add variables to standard recon to allow monitoring of changes to stand-level considerations such as tree grade, species composition (volume and basal area), regeneration density by species, etc. This would allow a better determination of how management is affecting the sustainability of healthy, high quality, forests and products.

C8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as “chain of custody”	<ul style="list-style-type: none"> There is a strong protocol to monitor theft The lock box system for submitting load/trip tickets is conscientiously implemented and enforced Counties can accurately provide production/harvest data by species, location and date, which is critical to the overall CoC reconciliation of certified product sourced from the County forests 	None noted
Score: 90		
Findings: The team has assigned a score that connotes outstanding conformance with this criterion. See section A.1.7 for more details.		

C8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan..	<ul style="list-style-type: none"> Recon updates lead to periodic adjustments in the allowable harvest levels. These adjustments have demonstrated the system’s ability to adjust allowable harvests following major disturbance or salvage harvests. 	<ul style="list-style-type: none"> Although revision to the management plan is systematic- the process for incorporating monitoring is lacking Room for improvement in how DNR monitoring is incorporated into County management
Score: 80		
Findings: There is one regional indicator associated with this Criterion that the audit team considered. The indicators focus on the use of monitoring efforts to implement and revise management plans. Based on the strengths and weaknesses listed above the team has assigned a score that connotes marginal conformance with this criterion.		

C8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of the monitoring indicators, including those listed in 8.2	<ul style="list-style-type: none"> Most assessment reports can be ordered on the DNR web Some monitoring undertaken by Wisconsin DNR is readily available on their website Except for tribal cultural resources and endangered species data, all information is publicly available, upon request County annual reports will be expanded to include monitoring information 	<ul style="list-style-type: none"> County Forests currently do not produce summaries of monitoring results
Score: 85		

Findings: There are two regional indicators associated with this Criterion that the audit team considered. The indicators focus on the availability of monitoring information to the public. Monitoring on the County Forests needs to be expanded, see CAR 2004.9. The current annual reports, which are public documents, should be expanded to cover biological information, e.g. include regeneration (type and cover type) success by year since regeneration. Accordingly, the team has assigned a score that connotes clear conformance with this criterion.

Importance Weighted Aggregate Score for Principle 8:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 5 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

FSC Principle #8 Monitoring and Assessment	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
8.1	0.15	78	
8.2	0.26	82	
8.3	0.08	90	
8.4	0.38	80	
8.5	0.14	85	
			81.68

Applying the normalized weights of relative importance to the 5 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of 82. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

1.9 PRINCIPLE #9: MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS

Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

This FSC Principle is elaborated through 4 Criteria that collectively focus on the identification and appropriate management of areas within the defined forest area(s) that possess notable attributes meriting conservation. Such attributes may be ecological or social, in nature. Areas of high conservation value are to be managed so that the defining attributes are maintained or enhanced; focused monitoring must be undertaken with respect to efficacy of HCVF management strategies.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
<p>C9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<ul style="list-style-type: none"> ▪ Many County Forests have identified and are conserving forest types/areas that qualify as HCVF, e.g., Karner Blue, barrens communities, State Natural Areas, scenic river ways, ice age trail, bluffs, hemlock, white pine communities, etc. ▪ County Forest system as a whole, was built from a highly denuded landscape, and as a result contains low amounts of pristine/unique forests ▪ <i>De facto</i> HCVF has been identified and protected in many Counties- through forester's knowledge of unique types and stands and a management approach that maintains those unique qualities. In some instances, unique types were protected by removing them from the harvest schedule (i.e. zzzz out of Recon). ▪ DNR has many excellent resources (e.g., Ecological Landscapes Handbook, NHI,) and well qualified staff (Bureau of Endangered Resources) needed to identify and guide management of HCVF 	<ul style="list-style-type: none"> ▪ Although many counties have identified and are protecting areas that would qualify as HCVF, the process completed to-date does not fully meet FSC Principle 9, nor has it been done consistently and systematically across all counties seeking FSC certification. ▪ Only a few County Forests have completed a full assessment for HCVF ▪ DNR's wide array of available resources to guide identification and management HCVF are used only sparingly by some Counties
<p>Score: 80</p>		

<p>Findings: There is one regional indicator associated with this Criterion that the audit team considered. The indicators focus on identifying the attributes and locations of High Conservation Value Forests. As noted from the many strengths listed above, County Forests have identified and are protecting many areas that would qualify as HCVF. Furthermore, it is the BER that has taken the lead in locating and evaluating potential HCV's within the County Forest System. However, there is a wide variability among Counties in the level and efforts to identify and protect HCVF. Thus, the process completed to-date does not fully meet FSC Principle 9. Accordingly, the team has assigned a score that connotes "marginal conformance" with this Criterion, and issued CAR 2004.10.</p> <p>CAR 2004.10: By the year 2 surveillance audit, WCFP must expand upon the current HCVF process. Either the WI DNR staff or county staffs must define the attributes that merit designation as high conservation value (as set forth in Principle 9 of the Lake States Regional Standard) utilizing:</p> <ul style="list-style-type: none"> • knowledge and information that county forestry and regional WI DNR staff possess regarding the local forest management area; • ecological targets in need of protection (detailed by the Bureau of Endangered Resources), which are derived from the Ecological Landscapes Handbook, Regional Ecological Assessments, Community Restoration & Old Growth, Wisconsin Land Legacy Study, and Nature Conservancy's Great Lakes Ecoregional Plan; • NHI database; • information gained through consultations with Bureau of Endangered Resources and other interested local and Statewide stakeholders. 		

<p>C9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	<ul style="list-style-type: none"> ▪ Experts outside of the County Forest program, primarily BER, are used extensively ▪ Forestry committee meetings and the 10-year planning process are used to gain public input on all of County Forest management 	<ul style="list-style-type: none"> ▪ The public has not been expressly consulted about HCVF on County Forests (CAR 2004.10)
<p>Score: 80</p>		
<p>Findings: Although some level of consultation with the public and DNR experts is occurring, more work needs to be done, see CAR 2004.10. Accordingly, the team has assigned a score that connotes only marginal conformance with this criterion.</p>		

<p>C9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes¹¹ ...</p>	<ul style="list-style-type: none">▪ Management plans focus on maintaining important attributes and resource values. For areas identified for conservation-specific management guidelines are found in 10-year plans, BMP guidelines, and/or other DNR Handbooks▪ County Forests have played a key role in the active management necessary to enhance Barrens▪ Areas qualifying as HCVF that have been identified have been well protected	<ul style="list-style-type: none">▪ There is no express treatment of HCVF in the 10-year plans
<p>Score: 85</p>		
<p>Findings: There are four regional indicators associated with this Criterion that the audit team considered. The indicators focus on the management plans and activities associated with HCVF’s. Areas qualifying as HCVF that have been identified have been protected and or enhanced, and are covered under 10-year plans and/or other supporting documents. Furthermore, DNR has many excellent resources (e.g., Ecological Landscapes Handbook, NHI,) and well qualified staff (Bureau of Endangered Resources) needed to guide management of HCVF. As a result, the team is confident that the County Forests have the resources and ability to continue to manage newly identified HCVF (see CAR 2004.10) . Accordingly, the team has assigned a score that connotes clear conformance with this criterion.</p>		
<p>C9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<ul style="list-style-type: none">▪ Monitoring barrens through the Karner Blue HCP is very strong▪ One County actually had a surveillance camera installed in an area of HCVF for monitoring purposes	<ul style="list-style-type: none">▪ No systematic approach to monitoring status of already identified HCVF on County Forests and the effectiveness of measures employed to maintain it▪ Properties removed from Recon are no longer inventoried
<p>Score: 73</p>		

¹¹ Full text of C9.3: The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.

Findings: The one indicator considered focuses on the use of monitoring efforts to address changes in HCVF attributes. Other than DNR's monitoring of State Natural Areas and monitoring of barrens through the HCP, there remains little systematic effort being undertaken to conduct effective monitoring (e.g., effects of invasive exotics, impacts from deer browse, effect of management actions) of HCVF's. Accordingly, the team has assigned a score that connotes "clear non-conformance" with this Criterion.

CAR 2004.11: Phase 1: By the time of the year 1 surveillance audit WCFP must develop and implement monitoring protocols designed to assess the effectiveness of existing HCVF.

Phase 2:

By the year 2 surveillance audit, monitoring protocols to assess the expanded HCVF (resulting from CAR 2004.10) must be in-place.

Importance Weighted Aggregate Score for Principle 9:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

FSC Principle #9 Maintenance of High Conservation Value Forests	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
9.1	0.35	80	80.43
9.2	0.11	80	
9.3	0.35	85	
9.4	0.19	73	
			80.43

Applying the normalized weights of relative importance to the 4 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of **80**. Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

PRINCIPLE #10: PLANTATIONS

Per FSC protocols and guidelines, this Principle applies in certification evaluations where the silvicultural regimes employed in the field result in forest conditions that meet the definition of “plantation forest management.” As can be found in the glossary to the FSC P&C as well as the glossary to the Lake States Regional Standards, plantation forests are those that lack “most” of the structure, composition and characteristics of a native forest endemic to the region. Notably, clearcutting and planting, by itself, does not constitute plantation forest management.

Based upon a careful review of the silvicultural regimes employed on the County Forests, and an examination of the stand and forest structures resulting from the application of these regimes, it is the SCS audit team’s clear conclusion that the County Forest Program primarily practices natural forest management. Accordingly, the Principle was judged to not be applicable to this certification evaluation.

2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS

At the request of the certification applicant, SCS conducted a joint forest management and chain-of-custody certification evaluation of the defined forest area. Chain-of-custody certification is required throughout the supply chain if downstream purchasers and processors wish to carry forward the certified status of wood products sourced from the County Forests. With respect to the County Forests, the chain-of-custody focus is quite narrow, as Counties exclusively sell-standing timber. That is, the County Forests do not have control of the flow of wood products from their forests once the trees have been severed from the stump, by the successful bidder.

In the case of its management of the chain-of-custody obligations will include:

- Effectively notifying all purchasers of County Forests (included in the FSC group) timber sales that maintaining the FSC-certified status of the procured products requires each and every owner of the product, from severance at the stump onward, to hold valid FSC-endorsed chain-of-custody certificates
- Upon request from SCS making available the following County Forest timber sale information: purchaser’s name and contact information, species and volume sold, date of sale
- Notifying SCS and/or the FSC of any instances when a purchaser of County Forest timber (not holding a valid FSC-endorsed chain-of-custody certificate) uses the FSC logo
- Maintaining timber sale records for at least 5 years

2.1 EVALUATION OF RISKS OF MIXING CERTIFIED AND UN-CERTIFIED PRODUCT

CoC responsibilities end at the point of severance of trees from the stump, the risks of mixing certified and un-certified products falls completely on all down-stream owners/handlers, such as loggers, sawmillers, etc.

2.2 DESCRIPTION OF THE LOG CONTROL SYSTEM

Control system is limited to keeping accurate records of the volumes (by species) of timber/logs sold: purchaser names, locations of timber, date of sale, and certification number of purchaser (if available). It is not necessary for Counties to assemble this information in periodic reports, rather the information just needs to be retained and made available upon request. County Forests have an affirmative obligation to inform purchasers that they must hold valid FSC CoC certificates if the wood products are to remain certified.

2.3 END POINT OF CHAIN OF CUSTODY

The end of point of custody for County Forests is the stump.

2.4 VISUAL IDENTIFICATION AT END POINT OF CHAIN OF CUSTODY

The County Forest FM COC registration number should be added to the timber sale contract and/or sale prospectus. Inclusion of the registration number on haul tickets would also facilitate the downstream chain of custody but is not required as part of a County's obligations under FSC COC.

3.0 CONTROVERSIAL ISSUES

FSC requires the certification body to identify and briefly discuss, in a certification report, any controversial issues associated with the forest management unit for which certification is being sought. In the judgment of the SCS audit team, there are no major controversial issues associated with management of the County Forests. However, similar to virtually all public (and many private) forests there are points of disagreement and contention including:

- Early seral habitat: Many hunters and forest products companies want to see aspen managed to maximize the amount of early seral habitat, while some environmental groups want to see aspen composition move toward pre-settlement distribution
- Deer management—hunters want deer populations kept at maximum levels while environmental NGOs, conservation groups and scientists wish to see populations reduced
- ATV use—more ATV access is a major objective of ATV user groups and opposed by environmental NGOs and wildlife advocates

4.0 CERTIFICATION RECOMMENDATION

4.1 EXPLANATION OF SCORING AND WEIGHTING METHODS

The scoring and weighting procedures employed by SCS are discussed elsewhere in this report. They are also described in detail in the SCS *Forest Conservation Program* Operations Manual, available upon request from SCS' Emeryville, California, office.

4.2 RECOMMENDATION

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team recommends that the Wisconsin County Forest Program, as managed by the Wisconsin Department of Natural Resources, be awarded FSC certification with specified Corrective Action Requests. This recommendation is based upon the audit team's finding that there are currently no outstanding Major CARs.

5.0 APPENDICES

5.1 AGREEMENT ON THE IMPLEMENTATION OF CERTIFICATION CONDITIONS

As part of the certification contract, Wisconsin County Forests agrees to comply with the conditions stipulated below within the stated time frames. Non-compliance with these conditions could lead to withdraw of certification.

See Section 3.4 of this report for a **List of Conditions**.

The signed copy of Conditions Agreement is on file at the SCS Main Office.

5.2 PEER REVIEWER COMMENTS

Candidate Operation: Wisconsin County Forest Program

Peer Reviewer: Calvin Mukumoto

Date of Review: February 6, 2005

Reviewer Comments

Assessment of Report Quality:

The report clearly described the process of the assessment, the criteria used to establish corrective actions and recommendations and the basis of the evaluation by the certification team. The report format is excellent which allows the reviewer easy access of the reasons for Corrective Action and or recommendation. The use of tables is effective in clearly conveying the basis upon which the scoring decisions were reached. Descriptions of the organization were adequate to understand the Group Entity. The reference to the County forest Web site was useful in understanding the organization.

I am impressed by the clarity of the information. Overall the report in my opinion is of high quality.

Assessment Process:

Given the difficulty of the size and distribution of multiple counties, I feel the assessment process as described, was very good. The fact that 35 person days was spent on the evaluation supports the credibility of the evaluation and recommendations made in the report. The combination of the stakeholder consultation, review of written documents and the cross section of interviews and site visits were both impressive and gave the reviewer comfort in the accuracy of the conclusions drawn in the report.

Comments:

I found no disagreement with the ratings, major corrective actions, corrective actions and recommendations or conclusions in the report. Specific minor comments are as follows:

<p>Major CAR.2004.2</p>	<p>Prior to the award of certification, the Wisconsin County Forest Program (WCFP) must identify Tribes with customary use rights or other legal use rights to the management area. Participating counties, or the WI DNR on the counties' behalf, must invite relevant Tribes to participate in the planning process, particularly planning related to identification and protection of Tribal resources, including treaty rights and cultural and archaeological sites</p>
--------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Reviewer Comment	<p>This is a first step for soliciting information from Tribes. In my experience with reviewing similar efforts from Federal agencies, letters are often ineffective since there is little assurance of delivery to the appropriate person in the Tribal organization. Phone contact alone may also prove ineffective. Tribes are often reticent about providing information concerning culturally important sites or resources with persons whom they have no or little relationship. I was involved in a study of the implementation of the Standard and Guides for the Northwest Forest plan, US Forest Service, concerning cultural resources. We found that Tribes were fearful that revealing the location of culturally important sites or resources to non-native Americans may lead to desecration or over-harvest. The Tribes interviewed were less afraid to reveal these locations or work with Federal agencies if they had a relationship built with the individual Federal employee. If compliance with major CAR 2004.2 does not elicit adequate Tribal input, I suggest that the Participating Counties or the WI DNR on behalf of the participating Counties consider establishing direct contact with Tribal leadership through one-on-one meetings and begin a pathway towards building a relationship with the Tribes.</p> <p>Working together can enlarge the opportunities for all. For example, the Tulalip Tribe of Washington was able to bridge the gap of advocacy for fisheries versus runoff from dairy farms into fish bearing streams. The Tulalip Tribe working with the dairy farms of the Skagit Valley discovered a collaborative solution. The runoff from the dairy farms will be collected by a Tribally owned bio digester producing methane for power generation. Thus the fish habitat is protected, the dairy farmers are able to operate, and the Tribe has a new renewable energy enterprise.</p>
SCS Response	<p><i>Agreed that Counties should pursue other options for consulting with Tribes- should the current mailing approach not function as intended. The idea that Tribes would be hesitant to respond without personal contact is logical, and indicates that a lack of response does not necessarily mean a lack of interest.</i></p>

CAR 2004.1	CAR 2004.1: At the year 1 surveillance audit (approximately 12 months from award of certification), participating counties, or the WI DNR on the counties' behalf, must demonstrate how input received from Tribes was considered and utilized to improve identification and protection of Tribal resources, including treaty rights and cultural and archaeological sites.
Reviewer Comment	In addition, perhaps feedback from the Tribes on how their input was solicited and used would provide a basis to monitor quality of the Counties' response.
SCS Response	<i>Agreed- follow-up consultation with the Tribes will be done during surveillance audits</i>
C3.4 Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species1...	Findings: Not Applicable as County Forests does not use knowledge or management techniques originating from Native Americans.
Reviewer Comment	Although the Counties do not use traditional knowledge, use of Traditional Ecological Knowledge (TEK) has been used for the promotion of culturally important species in California. The Maidu Tribe of California entered into a 10 year Stewardship contract with the US Forest Service utilizing TEK for forest ecological restoration. This relationship has been reported to be of benefit for both the Tribe and the US Forest Service. The Forest Service is learning new techniques that are less invasive but effective.
SCS Response	<i>Noted</i>
1.3.4 Estimates of Maximum Sustainable Yield	Harvests are "regulated" at the forest level using area control where the annual allowable harvest, measured in acres per year, is disaggregated to forest cover types. Very simply, the allowable harvest for a given forest cover type (e.g., aspen) is computed as the total available area occupied by a cover type within a County Forest divided by the planned "rotation age" for that cover type. The Recon system allows Counties to adjust rotation age using early and late restraints (e.g., 5-years early, 10-years late).
Reviewer Comment	An example of the calculation employed would greatly enhance the clarity of this paragraph.

<i>SCS Response</i>	Example added to section 1.3.4
---------------------	--------------------------------

Summary

The Certification evaluation was clear and of high quality. It communicated fully the data being used, the process used in the evaluation and the reasons for ratings, corrective actions and recommendations. I support the corrective actions, recommendations and evaluation and ratings by the certification team.



Calvin T. Mukumoto

¹ Full text of C3.4: Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.

Review of the Certification Evaluation Report
For the Wisconsin County Forest Program
Prepared by Scientific Certification Systems

Reviewer: John Kotar, Emeritus Senior Scientist, Department of Forest Ecology and
Management, University of Wisconsin-Madison

I conducted this review by adhering to the guidelines provided by the SCS. The guidelines require the focus on the following elements:

- The clarity of the report in describing the evaluation that was conducted, the criteria that were employed, and the data that were collected.
- The adequacy of the report in clearly conveying the basis upon which the scoring decisions were reached.
- The appropriateness of the evaluation team's scoring recommendations in light of the information presented and the condition of the ownership's resource base, as described in the report and as known to the reviewer from other sources, including first-hand knowledge.

Based on my experience as a peer reviewer of several previous certification reports, by different certifying bodies, I find this report to be of the highest quality. Considering the diversity of forest condition and the fact that counties and the Wisconsin DNR share management responsibilities, this was not an easy task. The evaluation team's grasp of ecological and socio-economic conditions of Wisconsin's forest is immediately evident in their complete and succinct summary of the findings (sections 1.3, 1.4, 1.5 of the Report). The evaluation was based on a very large amount of data assembled by the team. The range and nature of the database is thoroughly documented in the Report.

Of great importance in any evaluation is the methodology used. Because the principles, criteria and indicators in the certification guidelines range in content and importance it is difficult to treat them objectively. Nevertheless, it is important for the evaluation team to devise a process to weigh and interpret the available information, not only to accurately assess the merit for certification, but also to establish a basis for explaining or justifying the team's decisions, principle by principle. Many evaluating bodies use a scale for "grading" the compliance with each criterion. However, criteria within a principle vary greatly in relative importance to each other and often from region to region and from ownership to ownership. The SCS team increased the objectivity of their process by assigning weights to each criterion. The most important feature of this approach is the adjustment of these weights according to region and nature of forest ownership. For example, proper disposal of unused chemicals and chemical containers is considered very important and the criterion dealing with this element would receive a high weight. However, if the use of chemicals by the forest ownership is limited or nonexistent, the weight of this criterion should be appropriately reduced. This approach results in assigning higher values (or weights) to other criteria within the principle that are regionally important.

By using a 100 point scale for judging each criterion, in combination with regionally adjusted weight for the criterion, the team was able to increase its confidence in judging the compliance with the principle. I consider the weights assigned to criteria of principles 6 and 9 generally to be reasonable for Wisconsin County Forest conditions.

Appropriateness of scoring recommendations

In terms of specifics my review is confined to Principles 6 and 9, the primary areas of my expertise. The evaluation team had a considerable body of information at its disposal for its assessment. In my judgement the weights assigned to criteria were generally well based. The descriptions of findings, together with the tabular presentation of strengths and weaknesses for each criterion provide a comprehensive analyses of issues. I paid particular attention to comments in the “weaknesses” column. It is readily apparent that many comments in this column relate to ecological issues and concepts not yet fully understood, or to those that only recently became recognized as management concerns. A good example of this may be the issue of ecological functions and values. The concept provides for a wide range of conditions to be yet identified and defined regionally and locally. (E.g. “genetic and ecosystem diversity” and “natural cycles that affect the productivity of the forest ecosystem”). The evaluation team recognized this and did not excessively “downgrade” the compliance level based on observations in these categories. Nevertheless, the comments in the “weaknesses” column are extremely valuable. Since one of the objectives of forest certification is to promote continuous improvement of forest management practices the comments provide a valuable input for the development of future management plans.

Regarding the Corrective Actions Requests (CARs) and recommendations pertaining to principles 6 and 9, I offer the following comments:

CAR 2004.4: By the year 1 surveillance audit, the WCFP must take necessary measures to ensure that DNR retains and fully uses its ability to execute authority over sale approval. Specifically, any significant deviations from the Silvicultural Handbook with respect to how northern hardwoods are managed needs to be identified and corrected.

Although no specifics were given in the Evaluation Report (from here on abbreviated as ER) the problem apparently stems from conditions of one County. This request should easily be met.

SCS Response: The specific non-conformances that triggered this CAR were discussed with the client during the audit. To avoid singling out the specific individual(s) and location SCS decided not report on the specifics. SCS agrees the CAR can be easily met.

Criterion C6.3, in Principle 6, received the highest weight by the review team; two sound recommendations were offered. I particularly support the need for construction of deer exclosures in order to more accurately assess the impact of deer on tree regeneration and on composition and structure of understory vegetation.

SCS Response: Noted

Criterion C6.4 was ranked fourth in terms of weights and received the lowest performance score. The following CAR was given:

CAR 2004.5: By the year 2 surveillance audit, WCFP must complete the following two phases to ensure full conformance to Criterion 6.4:

Phase 1: WCFP must work with WI DNR Bureau of Endangered Resources to complete the assessment for gaps in representative samples of existing ecosystems within the landscape that are best filled on county forests.

Phase 2: WCFP must initiate the process to formally recognise (this does not prohibit active management) any representative samples identified in Phase 1 that are unique to county forests and/or clearly best suited for SNA or some other form of special management designation on county forests.

The issue of “representative samples of existing ecosystems within the landscape” is a difficult one for many reasons. The dynamic nature of the forest makes it difficult to objectively determine what constitutes an ecosystem. Perhaps the most practical approach would be for Counties to attempt to maintain a full range of successional stages on all forest habitat types. Non-forest ecosystems e.g. bogs, swamps, rock outcrops etc. are easier to identify, map and maintain.

SCS Response: Very good suggestion- added to discussion on 6.4

Criterion C6.5, although receiving a satisfactory performance score of 85 was given the following CAR:

CAR 2004.6: By the year 1 surveillance audit, the WCFP must establish clear written criteria for acceptable levels of rutting, compaction, and residual damage; and these criteria must be implemented in the timber sale administration process.

Because of a large range of soil conditions across the State this CAR has merit. Acceptable levels for these impacts should be developed for specific groups of soils and on a county by county basis.

SCS Response: Very good suggestion- added to discussion on 6.5

Criterion C6.6. Because this criterion received one of the highest performance scores (90) the evaluation team may reconsider the need for CAR 2004.7: (*By the year 1 surveillance audit a written prescription must accompany all herbicide and pesticide applications.*). Because of a very large number of potential chemicals and specific uses I believe it is unreasonable to expect written prescriptions for each use **as long as assurances are made that all labelling on the products is followed.**

SCS Response: Unfortunately the FSC standard does not give any latitude with respect to this requirement.

Principle #9 received relatively low weighted average score (80.43). This is not to be unexpected considering the origin and historic purpose of Wisconsin's county forests. However, opportunities now exist to address this issue in light of current society's values and resources available. Thus, implementation of **CAR 2004.10**: {by the year 2 surveillance audit, WCFP must expand upon the current HCVF process. Either the WI DNR staff or county staffs must define the attributes that merit designation as high conservation value (as set forth in Principle 9 of the Lake States Regional Standard)} is reasonable.

SCS Response: Agreed

5.3 Conversion English Units to Metric Units Table

Length Conversion Factors

To convert from	to	multiply by
mile (US Statute)	kilometer (km)	1.609347
inch (in)	millimeter (mm)	25.4 *
inch (in)	centimeter (cm)	2.54 *
inch (in)	meter (m)	0.0254 *
foot (ft)	meter (m)	0.3048 *
yard (yd)	meter (m)	0.9144 *

Area Conversion Factors

To convert from	to	multiply by
square foot (sq ft)	square meter (sq m)	0.09290304 E
square inch (sq in)	square meter (sq m)	0.00064516 E
square yard (sq yd)	square meter (sq m)	0.83612736 E
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic inch (cu in)	cubic meter (cu m)	0.00001639
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
cubic yard (cu yd)	cubic meter (cu m)	0.7645549
gallon (gal)	liter	4.546
Canada liquid gallon (gal)	cubic meter (cu m)	0.004546
Canada liquid gallon (gal)	liter	3.7854118
U.S. liquid** gallon (gal)	cubic meter (cu m)	0.00378541
U.S. liquid fluid ounce (fl oz)	milliliters (ml)	29.57353
fluid ounce (fl oz)	cubic meter (cu m)	0.00002957

Mass Conversion Factors

pound (lb)	kilogram (kg)	0.4535924
avoirdupois ton, 2000 lb	kilogram (kg)	907.1848
grain	kilogram (kg)	0.0000648

Temperature Conversion Factors

degree Fahrenheit (F)	degree Celsius (C)	$t_c = (t_F - 32) / 1.8$
degree Fahrenheit (F)	kelvin (K)	$t_k = (t_F + 459.7) / 1.8$
kelvin (K)	degree Celsius (C)	$t_c = t_k - 273.15$

Velocity

mile per hour (mph)	kilometer per hour(km/hr)	1.60934
mile per hour (mph)	meter per second (m/s)	0.44704

1 acre	= 0.404686 hectares
1,000 acres	= 404.686 hectares
1 board foot	= 0.00348 cubic meters
1,000 board feet	= 3.48 cubic meters
1 cubic foot	= 0.028317cubic meters
1,000 cubic feet	= 28.317 cubic meters

Breast height = 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

5.4 PUBLIC NOTIFICATION LETTER



Public Notification Letter

To: Interested Parties
From: Scientific Certification Systems
Date: 8/27/2004
Re: Notification of Pending FSC Certification Evaluation of Wisconsin County Forests

The Wisconsin County Forest Program, in cooperation with Wisconsin Department of Natural Resources (DNR), is seeking Forest Stewardship Council (FSC) and/or Sustainable Forestry Initiative (SFI) certification for a portion of its County Forests. Of the 27 Counties, 16 are seeking both FSC and SFI, 2 are seeking only FSC, and 9 are seeking only SFI certification (see Table 1). Consistent with FSC group certification protocols, the Wisconsin Department of Natural Resources (DNR), in its support role to the individual county forest management operations, is serving as the *group entity* or *group manager*. Should certification be awarded, WI DNR would be the FSC certificate holder for the Wisconsin County Forest group scheme. The 18 Counties seeking FSC certification are referred to as the *group members*. This notification and solicitation for comments pertains to the Counties seeking **FSC certification** (either as joint FSC/SFI or FSC only) and Wisconsin DNR as the group manager of this FSC group scheme. In the event that certification is offered at the conclusion of the assessment, a decision whether or not to engage in forest certification will be made by the County Forestry Committees and/or County Boards.

Table 1.

Wisconsin County Forest Acres					
	acres	SFI only	FSC only	Both	None
Ashland	40,003	0	0	40,003	0
Barron	15,685	0	0	15,685	0
Bayfield	168,809	0	0	168,809	0
<i>Burnett</i>	<i>106,429</i>	<i>106,429</i>	<i>0</i>	<i>0</i>	<i>0</i>
Chippewa	33,107	0	33,107	0	0
Clark	132,847	0	132,847	0	0
Douglas	269,642	0	0	269,642	0

Eau Claire	52,252	0	0	52,252	0
Florence	36,352	0	0	36,352	0
Forest	10,848	0	0	10,848	0
Iron	174,202	0	0	174,202	0
Jackson	120,272	0	0	120,272	0
Juneau	14,363	0	0	14,363	0
<i>Langlade</i>	<i>127,109</i>	<i>127,109</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Lincoln</i>	<i>100,709</i>	<i>100,709</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Marathon</i>	<i>28,661</i>	<i>28,661</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Marinette</i>	<i>231,606</i>	<i>231,606</i>	<i>0</i>	<i>0</i>	<i>0</i>
Monroe	6706				6706
Oconto	43,515	0	0	43,515	0
<i>Oneida</i>	<i>82,311</i>	<i>82,311</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Polk</i>	<i>16,869</i>	<i>16,869</i>	<i>0</i>	<i>0</i>	<i>0</i>
Price	92,118	0	0	92,118	0
<i>Rusk</i>	<i>89,042</i>	<i>89,042</i>		<i>0</i>	<i>0</i>
Sawyer	113,811	0	0	113,811	0
Taylor	17,566	0	0	17,566	0
Vernon	880	0	0	0	880
<i>Vilas</i>	<i>40,820</i>	<i>40,820</i>	<i>0</i>	<i>0</i>	<i>0</i>
Washburn	148,935	0	0	148,935	0
Wood	37,554	0	0	37,554	0
Total Acres	2,353,023	823,556	165,954	1,355,927	7,586

Counties listed in italics are seeking only SFI certification

Scope and Certification Evaluation Process

Scientific Certification Systems (SCS), a FSC-accredited certification body based in Emeryville, California, will conduct this FSC evaluation. Performance will be evaluated against the FSC Lake States-Central Hardwoods Regional Standard, which has been officially endorsed by FSC International. A copy of the standard is available upon request from SCS or can be downloaded from www.fscstandards.org.

The Evaluation Process Includes the Following Phases:

- a) Public notification, solicitation of comments on the certification applicant
- b) Audit planning and document review
- c) Field assessment - A representative sample of field sites and operations within the defined forest area are inspected.
- d) Stakeholder consultation.
- e) Synthesis of findings and scoring – Compliance with the standard is ascertained and the certification decision is formulated

- f) Draft report – A report describing the evaluation process, findings, and certification decision is produced.
- g) Peer review – The evaluation report is peer reviewed by 2 independent natural resource professionals.
- h) Delivery of final certification report
- i) Public summary of certification report is released, if certification is awarded

Call for Public Participation

SCS welcomes comments on the Wisconsin DNR County Forest program or other topics pertinent to their seeking FSC certification, such as identification of high conservation value forests¹² within the County forests. Comments can be submitted via email, standard mail, or facsimile to Dave Wager (contact information below). If you would like to discuss in more detail via phone, please respond back with a phone number and a good time to reach you.

Dates

The field evaluation is scheduled to commence during the week of September 27th, 2004.

Dispute Resolution Procedure

As provided by the FSC Interim Dispute Resolution Protocol (Document 1.4.3) and the SCS Forest Conservation Program Operations Manual, dispute resolution procedures are in place and available to interested parties.

Additional Information

More information about FSC and SCS can be obtained from www.fsc.org and www.scs-certified.com. Information on Wisconsin DNR can be found at www.dnr.state.wi.us/org/land/forestry/.

Dave Wager
Director Forest Management Certification
Scientific Certification Systems
145 Park Place, Point Richmond, CA 94801
Tel (510) 236-9099, Fax (510) 236-8598
e-mail: dwager@scs-certified.com

¹² High Conservation Value Forests possess one or more of the following attributes: a) forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (eg. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) forest areas that are in or contain rare, threatened or endangered ecosystems c) forest areas that provide basic services of nature in critical situations (eg. watershed protection, erosion control) d) forest areas fundamental to meeting basic needs of local communities (eg. subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). Also see Principle 9, in the FSC Lake States Standard.

